

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

BURBERRY LIMITED; GIANNI VERSACE S.R.L.;
HERMÈS INTERNATIONAL; LOUIS VUITTON
MALLETIER; MONCLER, S.P.A; PRL USA
HOLDINGS, INC.; THE NORTH FACE APPAREL
CORP.; and TIMBERLAND, a division of VF
OUTDOOR, LLC, and TBL LICENSING LLC,

Plaintiffs,

-against-

VARIOUS JOHN DOES, JANE DOES, and
XYZ COMPANIES,

Defendants.

CIVIL ACTION NO.

22 CV _____

COMPLAINT

Plaintiffs Burberry Limited; Gianni Versace, S.r.l.; Hermès International; Louis Vuitton Malletier; Moncler S.p.A.; PRL USA Holdings, Inc.; The North Face Apparel Corp.; Timberland, a division of VF Outdoor, LLC, and TBL Licensing LLC (all collectively, “Plaintiffs”), through their attorneys, complaining of Defendants, allege as follows:

STATEMENT OF THE CASE

1. Plaintiffs seek monetary and injunctive relief against Defendants for numerous causes of action, including but not limited to, (i) trademark counterfeiting, in violation of 15 U.S.C. § 1114; (ii) trademark infringement, in violation of 15 U.S.C. § 1114; (iii) false descriptions/false designations of origin, in violation of 15 U.S.C. § 1125; and (iv) common law trademark infringement and unfair competition.

2. Certain areas of New York City have long been major distribution hubs for counterfeit goods that are sold throughout the United States. Wholesale and retail sales of

counterfeit goods occur frequently and regularly from locations around the city. Plaintiffs in this case, and trademark holders in general, have been plagued by the sale and distribution of counterfeit goods at locations all over New York City for years. To combat this illegal activity and protect their world-famous and valuable names, reputations, and trademarks, Plaintiffs have, at great expense, commenced and led enforcement efforts in and around New York City. Plaintiffs regularly work with law enforcement in operations against the individuals and entities selling counterfeit goods bearing its trademarks. Arrests for trademark counterfeiting have been made routinely by the New York City Police Department and by other agencies. The Mayor's Office of Special Enforcement for the City of New York has conducted numerous enforcement operations against the sellers of counterfeit goods.

JURISDICTION AND VENUE

3. These claims arise under the Trademark Act of 1946, 15 U.S.C. § 1051, *et seq.*, particularly under 15 U.S.C. § 1114(1). This Court has subject matter jurisdiction over the claims in this action which relate to trademark counterfeiting and infringement, dilution and false designations of origin and false descriptions pursuant to the provisions of 28 U.S.C. §§ 1331 and 1338 and 15 U.S.C. § 1121.

4. This Court has supplemental jurisdiction over the claims in this Complaint which arise under state statutory and common law pursuant to 28 U.S.C. § 1367(a), since the state law claims are so related to the federal claims that they form part of the same case or controversy and derive from a common nucleus of operative facts.

5. Venue is proper in this judicial district under 28 U.S.C. § 1391, because a substantial part of the events or omissions giving rise to the claims alleged by Plaintiffs occurred within Kings County in New York State.

THE PARTIES

6. Plaintiff Burberry Limited is a corporation duly organized and existing under the laws of the United Kingdom and having an office and principal place of business at Horseferry House, Horseferry Road, London, SW1P 2AW, United Kingdom. Burberry maintains an office in the United States at 444 Madison Avenue, New York, NY 10022 (“Burberry”).

7. Plaintiff Gianni Versace, S.r.l., formerly known as Gianni Versace, S.p.A., is a company organized under the laws of Italy with its principal place of business at Piazza Einaudi Nr. 4, 20124, Milan, Italy (“Versace”).

8. Plaintiff Hermès International is a corporation, organized and existing under the laws of France, having its principal place of business located at 24, rue du Faubourg Saint-Honoré, Paris, France (“Hermès”).

9. Plaintiff Louis Vuitton Malletier is a French company with its principal place of business located at 2 Rue du Pont Neuf, 75001, Paris, France (“LV”).

10. Plaintiff Moncler S.p.A. is a company organized under the laws of Italy with its principal place of business at Via Stendhal, 47 Milan, Italy I-20144 (“Moncler”).

11. Plaintiff PRL USA Holdings, Inc. is a Delaware Corporation with its principal place of business located at 650 Madison Avenue, New York, NY 10022 (“PRL”).

12. Plaintiff The North Face Apparel Corp. is a corporation duly organized and existing under the laws of the State of Delaware, with a corporate address of 3411 Silverside Road, Wilmington, DE 19810 (“TNF”).

13. Plaintiff Timberland, a division of VF Outdoor, LLC, is a Delaware Company with a principal place of business located at 200 Domain Drive, Stratham, New Hampshire 03885.

14. Plaintiff TBL Licensing LLC, an affiliate of Timberland, is a Delaware Company with a principal place of business located at 200 Domain Drive, Stratham, New Hampshire 03885 (collectively with Timberland, a division of VF Outdoor, LLC, “Timberland”).

15. Plaintiffs are informed and believe and thereupon allege that at all times relevant hereto defendants various John Does, Jane Does, and/or XYZ Companies (collectively referred to as “Defendants”), who are and have been doing business in the city and State of New York at the following locations: at least one John Doe, Jane Doe and/or XYZ Company at a Grey Ford Sprinter Van (N.Y. Plate No. KGA 6163 and/or NY Plate No. KXN 8119) parked at various locations between Cozine and Flatlands Avenues, Brooklyn, New York 11208; at least one John Doe, Jane Doe and/or XYZ Company at Stop & Stor Self Storage, Unit #117, 1700 Shore Parkway, Brooklyn, New York 11214; and at least three John Does, Jane Does and/or XYZ Companies at Aqua Duck Flea Market at 700 Fountain Avenue, Brooklyn, New York 11208, including but not limited to three booths identified in Figure E below.

16. Plaintiffs are informed and believe and thereupon allege that at all times relevant hereto Defendants have purchased, sold, and/or distributed counterfeit goods bearing Plaintiffs’ Federally Registered Trademarks, as defined below in paragraph 22.

17. Upon information and belief, due to the nature of Defendants and their business practices, the identities of the various John Does, Jane Does, and XYZ Companies are not presently known, and the Complaint will be amended, if appropriate, to include the name or names of said individuals or companies when such information becomes available.

PLAINTIFFS’ ACTIVITIES

18. Plaintiffs are industry leaders in the design, marketing, and distribution of a variety of merchandise including but not limited to apparel, belts, cosmetics, eyewear, footwear, handbags,

jackets, jewelry, perfumes, wallets, and watches bearing Plaintiffs' Federally Registered Trademarks.

19. For decades, Plaintiffs have developed their reputations and distinctive images across expanding product lines in both domestic and international markets.

20. Plaintiffs advertise, market, and sell their merchandise through numerous distribution channels including but not limited to exclusive retail stores, department stores, and online through Plaintiffs' websites.

21. Plaintiffs annually expend millions of dollars advertising their products.

22. Plaintiffs are the owners of numerous trademark registrations with the United States Patent & Trademark Office, including but not limited to those listed on Exhibit A attached hereto (hereinafter collectively referred to as "Plaintiffs' Federally Registered Trademarks").

23. Plaintiffs are the exclusive distributors or licensors in the United States of their merchandise, all of which bear one or more of Plaintiffs' Federally Registered Trademarks.

24. Plaintiffs are responsible for designing and/or licensing, assembling, finishing, marketing and selling in interstate commerce high quality apparel, belts, cosmetics, eyewear, footwear, handbags, jackets, jewelry, perfumes, wallets, watches, and many other products.

25. Plaintiffs' Federally Registered Trademarks are in full force and effect and many have become incontestable pursuant to 15 U.S.C. § 1065.

26. Plaintiffs have used Plaintiffs' Federally Registered Trademarks for many years, and in some instances decades, on and in connection with their merchandise.

27. Plaintiffs' Federally Registered Trademarks identify high quality merchandise originating with Plaintiffs.

28. Plaintiffs have gone and continue to go to great lengths to protect their names and enforce Plaintiffs' Federally Registered Trademarks.

DEFENDANTS' COUNTERFEITING & INFRINGING ACTIVITIES

29. Upon information and belief, Defendants have counterfeited and infringed, continue to counterfeit and infringe, and threaten to further counterfeit infringe Plaintiffs' Federally Registered Trademarks by manufacturing, distributing and selling unauthorized merchandise, including but not limited to high quality apparel, handbags, footwear, watches, perfume, and other accessories. The unauthorized products, which are being manufactured, distributed, and/or sold by Defendants, bear unauthorized copies of Plaintiffs' Federally Registered Trademarks. Defendants' counterfeiting and infringing activities constitute unauthorized public display and distribution of products bearing Plaintiffs' Federally Registered Trademarks.

30. Long after Plaintiffs' use and registration of Plaintiffs' Federally Registered Trademarks, Defendants, on information and belief, commenced the manufacture, distribution, and/or sale of merchandise bearing counterfeits and infringements of Plaintiffs' Federally Registered Trademarks as those trademarks appear on Plaintiffs' products and as shown in Exhibit A to this Complaint.

31. Upon information and belief, the activities of Defendants complained of herein constitute willful and intentional infringement of Plaintiffs' Federally Registered Trademarks, are in total disregard of Plaintiffs' rights, and were commenced and have continued in spite of Defendants' knowledge that the use of any of Plaintiffs' Federally Registered Trademarks, or copies or colorable imitations thereof, was and is in direct contravention of Plaintiffs' rights.

32. Use by Defendants of copies of Plaintiffs' Federally Registered Trademarks has been without Plaintiffs' consent, is likely to cause confusion and mistake in the minds of the purchasing

public, and, in particular, tends to and does falsely create the impression that the goods sold by Defendants are authorized, sponsored, or approved by Plaintiffs when, in fact, they are not.

***A. Grey Ford “Sprinter” Van (N.Y. Plate Nos. KGA 6163 & KXN 8119)
Various Locations Between Cozine and Flatlands Avenues
Brooklyn, New York 11208***

33. On October 14, 2022, on Logan Street between Cozine Avenue and Flatlands Avenue, Plaintiffs’ investigator sent an undercover informant to assess whether or not counterfeit merchandise bearing Plaintiffs’ Federally Registered Trademarks was being manufactured, distributed, and/or sold. The undercover informant observed counterfeit merchandise for sale bearing the Federally Registered Trademarks of Burberry, LV, Moncler, TNF, Versace, and other brands. Fig. A below is a photograph of the van observed as it appeared on or about October 14, 2022. The undercover informant then purchased a Versace shirt and LV wallets for one hundred and twenty U.S. Dollars (\$120.00).



Figs. A & B. Van & License Plate as It Appeared on October 14, 2022

34. On October 22, 2022, on Bishop Clarence V. Keaton Boulevard between Cozine Avenue and Flatlands Avenue, Plaintiffs’ investigator observed the above-described van bearing a different license plate (NY Plate No. KXN 8119) but still offering for sale counterfeit merchandise bearing the trademarks of Burberry, LV, Moncler, TNF, Versace, and other brands.



Figs. C & D. Van & License Plate as It Appeared on on October 22, 2022

35. Upon information and belief, the Defendant(s) at this van continue to manufacture, distribute, and/or sell counterfeit merchandise bearing Plaintiffs' Federally Registered Trademarks in the area between Cozine and Flatlands Avenues.

***B. Aqua Duck Flea Market
700 Fountain Avenue
Brooklyn, New York 11208***

36. On October 5, 2022, Plaintiffs dispatched an investigator to this location to assess whether counterfeit merchandise bearing Plaintiffs' Federally Registered Trademarks was still being manufactured, distributed, and/or sold. While at this location, the investigator observed at least three booths offering counterfeit merchandise bearing the Federally Registered Trademarks of Burberry, Moncler, TNF, and PRL. Figure D below shows the approximate locations of these three booths.



Fig. E. Map of Counterfeit Booths at Aqua Duck Flea Market

37. On October 5, 2022, while at Booth 1 in Figure D, the investigator observed counterfeit perfume and watches bearing the Federally Registered Trademarks of Burberry offered for sale by the vendor.

38. On October 5, 2022, while at Booth 2 in Figure D, the investigator observed counterfeit apparel bearing the Federally Registered Trademarks of Moncler and PRL being offered for sale by the vendor. The investigator then made an evidential purchase from this vendor of counterfeit PRL shirts for one hundred and twenty U.S. Dollar (\$120.00).

39. On October 5, 2022, while at Booth 3 in Figure D, the investigator observed counterfeit apparel bearing the Federally Registered Trademarks of TNF being offered for sale by the vendor.

40. On October 16, 2022, Plaintiffs again dispatched an investigator to this location to assess whether counterfeit merchandise bearing Plaintiffs' Federally Registered Trademarks was still being manufactured, distributed, and/or sold. While at Booth 3, the investigator observed counterfeit apparel bearing the Federally Registered Trademarks of Moncler being offered for sale by the vendor. The investigator then made an evidential purchase from this vendor of a counterfeit Moncler jacket for eight-five U.S. Dollars (\$85.00).

41. On October 22, 2022, Plaintiffs again dispatched an investigator to this location to assess whether counterfeit merchandise bearing Plaintiffs' Federally Registered Trademarks was still being manufactured, distributed, and/or sold. While at Booth 2, the investigator observed counterfeit apparel bearing the Federally Registered Trademarks of Moncler, PRL, and TNF being offered for sale by the vendor.



Fig. F. Counterfeit Booth 2 as It Appeared on October 22, 2022

42. Upon information and belief, the Defendant(s) at these locations continue to manufacture, distribute, and/or sell counterfeit merchandise bearing Plaintiffs' Federally Registered Trademarks.

***C. Stop & Stor Self Storage Unit #117
1700 Shore Parkway
Brooklyn, New York 11208***

43. On October 5, 2022, at the above storage unit, an undercover informant observed belts, handbags, and other merchandise bearing the trademarks of Burberry, Hermès, LV, Timberland, Versace, and other brands. This merchandise appeared to be counterfeits bearing the trademarks of Burberry, Hermès, LV, Timberland, Versace and other brands. Fig. C is a photograph of the storage unit observed as it appeared in or about October 2022.

44. All the merchandise observed appeared to be counterfeits bearing the trademarks of these Plaintiffs. The Undercover Informant then purchased a LV bags and Timberland boots for \$420 and delivered them to the Plaintiffs' investigator who confirmed the counterfeits.

45. Upon information and belief, the Defendant(s) at these locations continue to manufacture, distribute, and/or sell counterfeit merchandise bearing Plaintiffs' Federally Registered Trademarks.

**FIRST CAUSE OF ACTION
TRADEMARK COUNTERFEITING
15 U.S.C §1114**

46. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

47. Defendants have used spurious designations that are identical with, or substantially indistinguishable from, Plaintiffs' Federally Registered Trademarks on goods covered by registrations for Plaintiffs' Federally Registered Trademarks.

48. Defendants are intentionally and willfully using these spurious designations knowing they are counterfeit in connection with the advertising, sale, offering for sale and distribution of counterfeit goods for their own personal financial gain and such intentional and willful conduct by the Defendants makes this an exceptional case.

49. Defendants' use of the Plaintiffs' Federally Registered Trademarks to advertise, offer for sale, sell and distribute Defendants' counterfeit products was and is without the consent of Plaintiffs.

50. Defendants' unauthorized use of Plaintiffs' Federally Registered Trademarks on and in connection with the advertising and sale of counterfeit goods constitutes Defendants' use of Plaintiffs' Federally Registered Trademarks in commerce.

51. Defendants' unauthorized use of Plaintiffs' Federally Registered Trademarks as set forth above is likely to:

- (a) cause confusion, mistake and deception;
- (b) cause the public to believe that Defendants' counterfeit products are the same as Plaintiffs' products and/or that Defendants are authorized, sponsored or approved by Plaintiffs or that Defendants are affiliated, connected or associated with or in some way related to Plaintiffs; and
- (c) result in Defendants unfairly benefiting from Plaintiffs' advertising and promotion and profiting from the reputation of Plaintiffs and Plaintiffs' Federally Registered Trademarks all to the substantial and irreparable injury of the public, Plaintiffs and Plaintiffs' Federally Registered Trademarks and the substantial goodwill represented thereby.

52. Defendants' acts as aforesaid constitute trademark counterfeiting in violation of Section 32 of the Lanham Act, 15 U.S.C. §1114.

53. Plaintiffs have no adequate remedy at law and have suffered and continue to suffer irreparable harm and damage as a result of Defendants' acts as aforesaid in an amount not thus far determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

54. Defendants' wrongful acts of counterfeiting will continue unless enjoined by this Court.

55. Upon information and belief, Defendants have obtained gains, profits and advantages as a result of their wrongful acts in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

**SECOND CAUSE OF ACTION
TRADEMARK INFRINGEMENT
15 U.S.C. §1114**

56. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

57. Plaintiffs' Federally Registered Trademarks are fanciful and arbitrary and are associated in the mind of the public with Plaintiffs.

58. Based on Plaintiffs' extensive advertising, sales and the wide popularity of Plaintiffs' products, Plaintiffs' Federally Registered Trademarks have acquired secondary meaning so that any product and advertisement bearing such trademarks is immediately associated by purchasers and the public as being a product and affiliate of Plaintiffs.

59. Defendants use Plaintiffs' Federally Registered Trademarks in connection with Defendants' sale, distribution and advertising of their counterfeit and infringing goods.

60. Defendants' activities as aforesaid constitute Defendants' use in commerce of Plaintiffs' Federally Registered Trademarks.

61. Defendants have used Plaintiffs' Federally Registered Trademarks without Plaintiffs' consent or authorization. Defendants' use, including the sale and distribution of infringing products in interstate commerce, is likely to cause confusion and mistake in the minds of the public, leading the public to believe that Defendants' products emanate or originate from Plaintiffs, or that Plaintiffs have approved, sponsored or otherwise associated themselves with Defendants, which is untrue.

62. Defendants have intentionally used Plaintiffs' Federally Registered Trademarks in connection with the offering for sale, sale, and distribution of counterfeit goods, knowing they are the exclusive property of Plaintiffs.

63. Defendants' conduct is intended to exploit the goodwill and reputation associated with Plaintiffs' Registered Trademarks.

64. Plaintiffs have no control over the quality of Defendants' counterfeit merchandise. Because of the very real likelihood of confusion as to the source of Defendants' products, Plaintiffs' reputation and valuable goodwill in the Trademarks is at the mercy of Defendants' unscrupulous tactics.

65. Defendants' activities as aforesaid create the false and misleading impression that Defendants are sanctioned, assigned or authorized by Plaintiffs to use Plaintiffs' Federally Registered Trademarks to advertise, manufacture, distribute, appraise, offer for sale or sell counterfeit products bearing Plaintiffs' Federally Registered Trademarks when Defendants are not so authorized.

66. Defendants engage in the aforementioned activity with the intent to confuse and deceive consumers into believing that Defendants and the goods they sell are in some way sponsored by, affiliated or associated with Plaintiffs when the Defendants are not.

67. Defendants' unauthorized use of Plaintiffs' Federally Registered Trademarks as set forth above has resulted in Defendants unfairly benefiting from Plaintiffs' advertising and promotion and profiting from Plaintiffs' reputation and Plaintiffs' Federally Registered Trademarks, to the substantial and irreparable injury of the public, Plaintiffs and Plaintiffs' Federally Registered Trademarks and the substantial goodwill represented thereby.

68. Defendants' aforesaid acts constitute trademark infringement in violation of Section 32 of the Lanham Act, 15 U.S.C. §1114.

69. Defendants' acts have caused, and will continue to cause, great and irreparable injury to Plaintiffs, and unless such acts are restrained by this Court, they will continue, thereby causing Plaintiffs to continue to suffer great and irreparable injury. Plaintiffs have no adequate remedy at law.

70. Plaintiffs are informed and believe and thereon allege that Defendants' infringement is both intentional and egregious.

71. Plaintiffs have no adequate remedy at law and are suffering irreparable harm and damage as a result of the aforesaid acts of Defendants in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

72. Upon information and belief, Defendants have obtained gains, profits and advantages as a result of their wrongful acts in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

**THIRD CAUSE OF ACTION
FALSE DESIGNATIONS OF ORIGIN,
FALSE DESCRIPTIONS AND REPRESENTATIONS
15 U.S.C. §1125(a)**

73. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

74. Defendants have, in connection with their goods, used in commerce, and continue to use in commerce, Plaintiffs' Federally Registered Trademarks.

75. Defendants have affixed, applied and used in connection with their sale of goods, false designations of origin and false and misleading descriptions and representations, including Plaintiffs' Federally Registered Trademarks, which tend falsely to describe the origin, sponsorship, association or approval by Plaintiffs of the goods sold by the Defendants.

76. Defendants use one or more of Plaintiffs' Federally Registered Trademarks with full knowledge of the falsity of such designations of origin, descriptions and representations, all to the detriment of Plaintiffs.

77. Defendants' use of Plaintiffs' Federally Registered Trademarks on the counterfeit goods constitutes false descriptions and representations tending to falsely describe or represent Defendants and Defendants' products as being authorized, sponsored, affiliated or associated with Plaintiffs.

78. Defendants use one or more of Plaintiffs' Federally Registered Trademarks on counterfeit goods with the express intent to cause confusion and mistake, to deceive and mislead the purchasing public, to trade upon the high quality reputation of Plaintiffs and to improperly appropriate to themselves the valuable trademark rights of Plaintiffs.

79. Defendants' aforesaid acts constitute the use in commerce of false designations of origin and false and/or misleading descriptions or representations, tending to falsely or misleadingly describe and/or represent Defendants' products as those of Plaintiffs in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

80. Defendants' wrongful acts will continue unless enjoined by this Court.

81. Plaintiffs have no adequate remedy at law and are suffering irreparable harm and damage as a result of the aforesaid acts of Defendants in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

82. Upon information and belief, Defendants have obtained gains, profits and advantages as a result of their wrongful acts in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

**FOURTH CAUSE OF ACTION
FEDERAL TRADEMARK DILUTION
15 U.S.C. &1125(c)**

83. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

84. Plaintiffs are the exclusive owners of Plaintiffs' Federally Registered Trademarks listed on Exhibit A attached hereto.

85. Defendants' use of Plaintiffs' Federally Registered Trademarks on the counterfeit goods they sell constitutes Defendants' commercial use in commerce of Plaintiffs' Federally Registered Trademarks.

86. Plaintiffs' Federally Registered Trademarks have been used for years, and in some instances decades, and are so globally recognized and associated with Plaintiffs that they are entitled to be recognized as famous and distinctive under 15 U.S.C. §1125(c).

87. Plaintiffs' Federally Registered Trademarks have come to have a secondary meaning indicative of origin, relationship, sponsorship and/or association with the Plaintiffs and its distinctive reputation for high quality. The purchasing public is likely to attribute to Plaintiffs, Defendants' use of Plaintiffs' Federally Registered Trademarks as a source of origin, authorization and/or sponsorship for the products Defendants sell and further, purchase Defendants' products in the

erroneous belief that Defendants are associated with, sponsored by or affiliated with Plaintiffs, when Defendants are not.

88. Plaintiffs have not authorized or licensed the use of Plaintiffs' Federally Registered Trademarks to Defendants.

89. Defendants' unauthorized use of Plaintiffs' Federally Registered Trademarks in their marketing, sale and distribution of counterfeit products are diluting the distinctive quality of Plaintiffs' Federally Registered Trademarks and the goodwill associated with them in violation of Section 43(a) of the Lanham Act, 15 U.S.C § 1125(c).

90. Such conduct has injured Plaintiffs and said injury will continue unless the Court enjoins Defendants from committing further wrongful acts.

91. Upon information and belief, Defendants intentionally and willfully utilized Plaintiffs' Federally Registered Trademarks and traded on Plaintiffs' reputation and goodwill.

92. Plaintiffs have no adequate remedy at law and are suffering irreparable harm and damage as a result of the aforesaid acts of Defendants in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

93. Upon information and belief, Defendants have obtained gains, profits and advantages as a result of their wrongful acts in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

**FIFTH CAUSE OF ACTION
INJURY TO BUSINESS REPUTATION AND DILUTION
NEW YORK GENERAL BUSINESS LAW § 360-1**

94. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

95. Plaintiffs, on behalf of the general public, as well as for themselves seek recovery from Defendants for violation of New York General Business Law § 360-1, et seq.

96. By virtue of Defendants' unauthorized use of Plaintiffs' Federally Registered Trademarks, such use trading on the good will associated with Plaintiffs, Defendants have misled and will continue to mislead the public into assuming a connection between Plaintiffs and Defendants' products.

97. By falsely suggesting a connection with or sponsorship by Plaintiffs, Defendants are likely to cause public confusion constituting unfair competition within the meaning of New York Business Law § 360-1.

98. If such action on the part of Defendants continue, Plaintiffs will suffer irreparable harm of a continuing nature for which there is no adequate remedy at law.

99. Plaintiffs have no adequate remedy at law and are suffering irreparable harm and damage as a result of the aforesaid acts of Defendants in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

100. Upon information and belief, Defendants have obtained gains, profits and advantages as a result of their wrongful acts in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

SIXTH CAUSE OF ACTION COMMON LAW TRADEMARK INFRINGEMENT

101. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

102. Defendants' acts previously alleged herein constitute common law trademark infringement.

103. Plaintiffs are without adequate remedy at law, as Defendants' acts have caused Plaintiffs irreparable harm to its business reputation, good will and stature in the business community.

104. Plaintiffs are informed and believe and thereon allege that Defendants committed the above alleged acts oppressively, fraudulently, maliciously and in conscious disregard of Plaintiffs' rights, and Plaintiffs are therefore entitled to exemplary and punitive damages pursuant to the common law of the State of New York in an amount sufficient to punish, deter and make an example of Defendants.

105. The manufacture, distribution and sale of the unauthorized and infringing products by Defendants are without any permission, license or other authorization from Plaintiffs. The said unauthorized products are being distributed and sold in interstate commerce.

106. Plaintiffs have no adequate remedy at law and are suffering irreparable harm and damage as a result of the aforesaid acts of Defendants in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

107. Upon information and belief, Defendants have obtained gains, profits and advantages as a result of their wrongful acts in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

**SEVENTH CAUSE OF ACTION
MISAPPROPRIATION AND UNFAIR COMPETITION
UNDER NEW YORK COMMON LAW**

108. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

109. Defendants' aforesaid acts constitute misappropriation and infringement of Plaintiffs' property rights, goodwill and reputation and unfair competition under the common law of the State of New York.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs demand judgment against Defendants as follows:

- I. That preliminary and permanent injunctions be issued enjoining and restraining Defendants and their officers, agents, servants, employees and attorneys and all those in active concert or participation with them, from:
 - A. Using any reproduction, counterfeit, copy or colorable imitation of Plaintiffs' Federally Registered Trademarks to identify any goods or the rendering of any services not authorized by Plaintiffs;
 - B. Engaging in any course of conduct likely to cause confusion, deception or mistake, or to injure Plaintiffs' business reputation or dilute the distinctive quality of Plaintiffs' name and Plaintiffs' Federally Registered Trademarks;
 - C. Using a false description or representation including words or other symbols tending to falsely describe or represent Defendants' unauthorized goods as being those of Plaintiffs or sponsored by or associated with Plaintiffs and from offering such goods into commerce;
 - D. Further infringing Plaintiffs' Federally Registered Trademarks by manufacturing, producing, distributing, circulating, selling, marketing, offering for sale, advertising, promoting, renting, displaying or otherwise disposing of any products not authorized by Plaintiffs bearing any simulation, reproduction, counterfeit, copy or colorable imitation of Plaintiffs' Federally Registered Trademarks;

- E. Using any simulation, reproduction, counterfeit, copy or colorable imitation of Plaintiffs' Federally Registered Trademarks in connection with the rental, promotion, advertisement, display, sale, offering for sale, manufacture, production, circulation or distribution of any unauthorized products in such fashion as to relate or connect, or tend to relate or connect, such products in any way to Plaintiffs, or to any goods sold, manufactured, sponsored or approved by, or connected with Plaintiffs;
- F. Making any statement or representation whatsoever, or using any false designation of origin or false description, or performing any act, which can or is likely to lead the trade or public, or individual members thereof, to believe that any products manufactured, distributed, sold or rented by Defendants is in any manner associated or connected with Plaintiffs, or is sold, manufactured, licensed, sponsored, approved or authorized by Plaintiffs;
- G. Constituting an infringement of any of Plaintiffs' Federally Registered Trademarks or of Plaintiffs' rights in, or to use or to exploit, said Registered Trademarks, or constituting any dilution of Plaintiffs' name, reputation or goodwill;
- H. Secreting, destroying, altering, removing, or otherwise dealing with the unauthorized products or any books or records which contain any information relating to the importing, manufacturing, producing, distributing, circulating, selling, marketing, offering for sale, advertising, promoting, renting or displaying of all unauthorized products which infringe Plaintiffs' Federally Registered Trademarks;
- I. Selling, offering for sale, or advertising any merchandise bearing Plaintiffs' Federally Registered Trademarks on the Internet or in e-commerce, including but not limited to all forms of social media; and

- J. Effecting assignments or transfers, forming new entities or associations or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth in subparagraphs (A) through (I).
- II. Directing that Defendants deliver up for destruction to Plaintiffs all unauthorized products and advertisements in their possession or under their control bearing any of Plaintiffs' Federally Registered Trademarks or any simulation, reproduction, counterfeit, copy or colorable imitation thereof, and all plates, molds, matrices and other means of production of same pursuant to 15 U.S.C. §1118.
- III. Directing such other relief as the Court may deem appropriate to prevent the trade and public from deriving any erroneous impression that any products manufactured, sold or otherwise circulated or promoted by Defendants are authorized by Plaintiffs or related in any way to Plaintiffs' products.
- IV. Directing Defendants to supply Plaintiffs with the name and address of each person or entity from whom or from which has purchased any item bearing Plaintiffs' Federally Registered Trademarks.
- V. Directing Defendants, within thirty (30) days after the service of judgment upon it, with notice of entry thereof, to file with the Court, and serve upon Plaintiffs, a written report under oath setting forth in detail the manner in which Defendants have complied with paragraphs I through IV above.
- VI. Awarding to Plaintiffs the Defendants' profits from its unlawful acts herein alleged as Defendants' total sales of merchandise bearing any one or more of the Plaintiffs' Federally Registered Trademarks, less any elements of cost or deductions proved by Defendants and allowed by law.

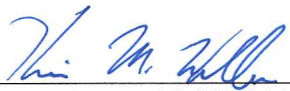
- VII. Awarding to Plaintiffs the damages from Defendants' unlawful acts herein alleged.
- VIII. Pursuant to 15 U.S.C. § 1117(a), directing Defendants to pay Plaintiffs all of the profits assessed pursuant to paragraph VI, *supra*, together with three times the amount of damages assessed pursuant to paragraph VII, *supra*, with prejudgment interest on the foregoing sums.
- IX. In the event that the Court determines that Defendants intentionally used a mark knowing that such mark was a counterfeit mark, directing Defendants to pay Plaintiffs:
- A. Pursuant to 15 U.S.C. § 1117(a) and (b) all of the profits assessed pursuant to paragraph VI, *supra*; plus,
 - B. Pursuant to 15 U.S.C. § 1117(a) and (b) three times the profits assessed pursuant to paragraph VI, *supra*, or three times the damages assessed pursuant to paragraph VII, *supra*, whichever is greater; and
 - C. Prejudgment interest on the foregoing sums at an annual interest rate established under 26 U.S.C. § 6621(a)(2) commencing as of the date of the service of the complaint herein.
- X. Ordering that Plaintiffs recover the costs of this action together with reasonable attorneys' and investigators' fees and prejudgment interest in accordance with 15 U.S.C. § 1117.
- XI. Directing that this Court retain jurisdiction of this action for the purpose of enabling Plaintiffs to apply to the Court at any time for such further orders and interpretation or execution of any order entered in this action, for the modification of any such order, for the enforcement or compliance therewith and for the punishment of any violations thereof.

XII. Awarding to Plaintiffs such other and further relief as the Court may deem just and proper, together with the costs and disbursements which Plaintiffs have incurred in connection with this action.

Dated: October 25, 2022
New York, New York

Respectfully submitted,

BAKER & HOSTETLER LLP

By: 
Heather J. McDonald (HM 3320)
Robertson D. Beckerlegge (RB 1829)
Kevin M. Wallace (KW 1284)
45 Rockefeller Plaza
14th Floor
New York, NY 10111
Tel: (212) 589-4200
Fax: (212) 589-4201

Attorneys for Plaintiffs

EXHIBIT A

BURBERRY LIMITED

<u>TRADEMARK</u>	<u>REGISTRATION NUMBER</u>	<u>REGISTRATION DATE</u>	<u>GOODS</u>
BURBERRY	260,843	27-Aug-1929	Clothing – namely, coats and topcoats for men, women, and children; jackets for men, women, and children; breeches for boys; suits for men and boys; waistcoats for men, women, and children; overalls for women and children; skirts for outer wear for women and children; capes for men, women, and children; hats and caps for men, women, and children; bonnets for children, hoods and toques for men, women, children; neckties for men, women, and children; stockings and socks for men, women, and children; braces and suspenders for men and children; belts for outer wear for men, women, and children; boots of rubber and fabric or combinations of these materials for men, women, and children; shoes and slippers of leather, rubber, and fabric or combinations of these materials for men, women, and children; gloves for men, women, and children, of leather and fabric.
BURBERRY	1,133,122	15-Apr-1980	Handbags, travelling bags, leather travelling cases, attache cases, leather briefcases, purses, pocket wallets, umbrellas.
BURBERRY	1,607,316	24-Jul-1990	Spectacles, sunglasses, fitted cases, frames and lenses, all for sunglasses or for spectacles.
BURBERRY	1,747,765	19-Jan-1993	Wrist watches and straps and bracelets therefor, and cuff links.
BURBERRY	2,624,684	24-Sep-2002	Retail store services featuring clothing, watches, sunglasses, accessories, shoes, luggage, leather goods, and fragrance.
BURBERRY	2,629,931	8-Oct-2002	Fragrance; non-medicated toilet preparations, namely, perfumes, eau de cologne, and toilet water, cosmetic preparations for the hair, namely, shampoos, soaps for the body, shower gels and bath gels and bath foams; antiperspirants and deodorants; shaving preparations.
BURBERRY	2,875,336	17-Aug-2004	Sunglasses, combined sunglasses, spectacles, optical glasses, fitted frames and lenses for the aforesaid goods; cases and holders for the aforesaid goods; parts and fittings for all the aforesaid goods; cases and holders for portable computers and mobile telephones; watches, clocks and parts and fittings for all

<u>TRADEMARK</u>	<u>REGISTRATION NUMBER</u>	<u>REGISTRATION DATE</u>	<u>GOODS</u>
			the aforesaid goods, wrist watches and straps and bracelets therefor and pocket watches, jewelry, imitation jewellery, tie-pins and cuff links; and jewelry boxes, hat and shoe ornaments all made of precious metal or coated therewith.
BURBERRY	3,879,249	23-Nov-2010	Articles of outer clothing, namely, coats, jackets, rainwear, ponchos, gilets, detachable coat linings, raincoats; blouses; casual coats; polo shirts; blouses; dresses; pyjamas; knitwear, namely, jerseys, jumpers, cardigans, sweaters, knitted leggings; shorts; trousers; suits; skirts; jackets; articles of underclothing, namely, boxer shorts, lingerie, loungewear, nightwear, underwear, undergarments; hosiery; headwear; footwear; sports clothing, namely, sweat pants, sweat shirts, swimwear; sports footwear; tracksuits; ready-made linings, namely, finished textile linings for garments; ties; clothing belts; wraps; scarves; shawls and stoles; gloves.
BURBERRY	3,898,440	4-Jan-2011	Articles made from material and textile, namely, bed blankets, blanket throws, children's blankets, lap blankets, towels, handkerchiefs, cushion covers.
BURBERRY	4,004,568	2-Aug-2011	Cosmetics; aftershave preparations; non-medicated preparations for the bath and shower, body care preparations, skin care preparations, nail care preparations and accessories; room fragrances; baby creams, lotions, shampoos.
BURBERRY	4,212,001	25-Sep-2012	Visual and audio recordings featuring music, video, animation, voice, still photography; digital music downloadable from the internet; custom manufacture of clothing, custom manufacture of accessories, namely, bags, briefcases, handbags, wallets, purses, document holders, bags and cases for makeup, key rings, luggage, umbrellas, cases and holders for electronic devices, eyewear and cases for eyewear, belts; entertainment services, namely, production and online distribution of sound, music, and video recordings in the fields of music and fashion; providing non-downloadable music and video recordings in the fields of music and fashion for others via a global computer network; production and distribution of videos in the

<u>TRADEMARK</u>	<u>REGISTRATION NUMBER</u>	<u>REGISTRATION DATE</u>	<u>GOODS</u>
			fields of music and fashion; design of clothing and fashion accessories for others.
BURBERRY	510,077	24-May-1949	Clothing – namely, coats and topcoats for men, women, and children; jackets for men, women, and children; breeches for boys; suits for men and boys; waistcoats for men, women, and children; skirts for outer wear for women and children; capes for men, women, and children; hats and caps for men, women, and children; bonnets for children; hoods and toques for men, women, and children; neckties for men, women, and children; stockings and socks for men, women, and children; braces and suspenders for men and children; belts for outer wear for men, women, and children; boots for men, women, and children, of leather and rubber or combinations of these materials; shoes and slippers for men, women, and children; of leather, rubber, and fabric or combinations of these materials; gloves for men, women, and children of leather and fabric.
BURBERRY	6,331,235	27-Apr-2021	Protective industrial respiratory masks; Protective clothing for medical purposes; respiratory masks for medical use; sanitary masks for medical purposes; disposable sanitary masks for virus isolation purposes; sanitary masks made of cloth for medical purposes; face protection shields for medical purposes
BURBERRY BRIT	3,029,220	13-Dec-2005	Non-medicated toilet preparations, namely, perfumes, eau de cologne, and toilet water, shower gels and bath gels and bath foams; antiperspirants and deodorants; shaving preparations.
BURBERRY CHECK	1,241,222	7-Jun-1983	Coats, top coats, jackets, trousers, slacks, waistcoats, skirts, capes, hats, bonnets, berets, shirts, scarves, shawls and blouses.
BURBERRY CHECK	1,855,154	20-Sep-1994	Watches and parts therefor; straps, bracelets for wrist watches; cuff links.
BURBERRY CHECK	2,015,462	12-Nov-1996	Socks.
BURBERRY CHECK	2,022,789	17-Dec-1996	Suitcases, traveling bags, holdalls, suit and garment carriers for travel, attache cases, document cases, briefcases, purses, drawstring pouches, wallets, billfolds, passport holders,

<u>TRADEMARK</u>	<u>REGISTRATION NUMBER</u>	<u>REGISTRATION DATE</u>	<u>GOODS</u>
			key cases, handbags, shoulder bags, credit card cases, business card cases, toilet bags sold empty, toilet cases sold empty, shaving bags sold empty, tie cases for travel, umbrellas and parasols; traveling comforter, namely, fabric blanket-like articles for keeping warm, e.g., when traveling in cold climates, or for use as a stadium blanket; clothing for men and women, namely, scarves, pullovers, cardigans, sweaters, overcoats, raincoats, shirts, belts; slippers for men.
BURBERRY CHECK	2,845,852	25-May-2004	Sunglasses, spectacles, optical glasses; fitted frames and lenses for the aforesaid goods; cases and holders for the aforesaid goods; carrying cases and holders for portable computers and mobile telephones.
BURBERRY CHECK	3,529,814	11-Nov-2008	Non-metal key fobs; blankets, throws, handkerchiefs, textile used as linings for clothing and accessories, fabrics for use in the manufacture of clothing, footwear, headwear, hosiery, belts, bags, cases, holders and key rings, umbrellas, watches, jewelry, towels, blankets, throws; Coats, detachable coat linings, rainwear, ponchos, jackets, gilets, jerseys, jumpers, sweaters, blouses, shirts, polo shirts, t-shirts, vests, dresses, skirts, trousers, jeans, shorts, ski wear, sports shirts, sports trousers, sweat shirts, waterproof clothing, namely, coats, jackets, bikinis, sarongs, swimwear, bathrobes, boxer shorts, loungewear, nightwear, undergarments, ties, cravats, footwear, shoes, boots, athletic footwear, slippers, ballet slippers, socks, leggings, caps, hats, head scarves, belts, gloves, mufflers, scarves, shawls, stoles, pashminas, children's and infant's clothing, namely, coats, jackets, ponchos, jerseys, sweaters, blouses, shirts, t-shirts, singlets, vests, tank tops, waistcoats, suits, dresses, skirts, trousers, jeans, shorts, children's headwear, children's swimwear, children's nightwear, children's under garments, and one-piece clothing, headwear, footwear; cloth bibs; teddy bears; retail store services in the fields of clothing, accessories, footwear, headgear, luggage, leather goods, timepieces, jewelry, eyewear and fragrances.
BURBERRY CHECK	4,123,508	10-Apr-2012	Telephones, mobile telephones, mobile electronic devices, namely, PDAs (personal digital assistants), smart phones, personal

<u>TRADEMARK</u>	<u>REGISTRATION NUMBER</u>	<u>REGISTRATION DATE</u>	<u>GOODS</u>
			entertainment devices, namely, electronic book readers, tablet computers, netbooks, electronic notebooks, handheld computers, portable digital audio and/or video players, and accessories for the foregoing, namely, headsets, headphones, covers, fascia, lanyards specially designed for mobile electronic devices and mobile telephones, stylus, battery chargers, phone jewelry and accessory charms for mobile electronic devices; cases and holders for telephones, mobile telephones and mobile electronic devices, namely, for PDAs (personal digital assistants), smart phones, personal entertainment devices in the nature of electronic book readers, tablet computers, netbooks, electronic notebooks, handheld computers and portable digital audio and/or video players.
BURBERRY CHECK	2,689,921	25-Feb-2003	Perfumes, eau de toilettes, body lotion; soaps; personal deodorants; eau de parfums; aftershaves; shampoo for the body; shower gels; bath gels.
BURBERRY CHECK (No Color)	2,728,709	24-Jun-2003	Fabrics for use in the manufacture of clothing, underclothes, swimwear, headwear, footwear, hosiery, socks; and belts; fabrics for use in the manufacture of cosmetic cases and bags, toiletry cases and bags, and shaving cases and bags; fabrics for use in the manufacture of purses, pouches, bags, luggage, carriers, travel bags, and suit and garment bags; fabrics for use in the manufacture of cases and holders for money, documents, keys, glasses, and ties; fabrics for use in the manufacture of umbrellas and parasols and cases thereof; fabrics for use in the manufacture of straps and bracelets for watches, and straps for shoes and bags; fabrics for use in the manufacture of lining for all the foregoing goods; comforters and blankets.
BURBERRY CHECK (No Color)	2,612,272	27-Aug-2002	Retail store services in the fields of clothing, accessories, shoes, luggage, leather goods and fragrances.
BURBERRY CHECK (No Color)	2,732,617	1-Jul-2003	Perfumes, eau de toilettes, eau de parfums; body lotion, soaps; personal deodorants; aftershave; shampoo for the hair and for the body; shower gels; bath gels; articles of luggage, namely, suitcases, athletic and sport bags, beach bags, carry-on bags, clutch bags; duffel and gym bags; overnight bags; school

<u>TRADEMARK</u>	<u>REGISTRATION NUMBER</u>	<u>REGISTRATION DATE</u>	<u>GOODS</u>
			book bags, shoulder bags, tote bags, garment bags for travel, carryall bags, traveling bags, hand bags, leather bags for computers and cameras; wallets and purses; toiletry bags sold empty and cosmetics bags sold empty; brief cases, satchels and portfolios; parasols, umbrellas, walking sticks; leather key fobs, leather key holders; articles of outerclothing, namely, coats, overcoats, trench coats, casual coats, raincoats, jackets and blousons, poloshirts, blouses, dresses, pyjamas, knitwear namely, jumpers, sweaters, gilets, knitted shirts, knitted skirts and knitted scarves; and shorts, trousers, suits, skirts, underclothes, hosiery, headwear, footwear, sports clothing namely, sports trousers, sports shorts, sports shirts, sports jackets, sports footwear; tracksuits, garments that can be attached to or detached from coats, raincoats, trench coats, or casual coats for additional warmth; ties, belts, wraps, serapes, scarves, shawls and stoles, gloves.
BURBERRY CHECK (No Color)	4,441,542	26-Nov-2013	Sunglasses, camera cases, spectacles, optical glasses, mobile phone accessories, namely, mobile phone covers charms and lanyards for mobile phones; fitted frames and lenses for the aforesaid goods; cases and holders for the aforesaid goods; parts and fittings for all the aforesaid goods; cases and holders for portable electronic devices, namely, PDAs (personal digital assistants), smart phones, electronic book readers, tablet computers, netbooks, electronic notebooks, handheld computers and portable digital audio and/or video players, mobile telephones, portable audio and video systems and computers; Watches, watch straps and bracelets therefor; jewelry, imitation jewelry, tie-pins, tie clips and cuff links; articles made of precious metals or coated therewith, namely, key rings.
BURBERRY LONDON	3,202,484	23-Jan-2007	Articles of outerclothing, namely, coats, trench coats, casual coats, jackets; shirts, dresses; ties.
EQUESTRIAN KNIGHT DEVICE	2,512,119	27-Nov-2001	Non-medicated toilet preparations, namely, perfumes, eau de cologne, and toilet water, shampoos, shower gels and bath gels; shaving preparations; articles of luggage, namely, suitcases, athletic and sport bags, beach bags, carry-on bags, clutch bags, overnight bags, shoulder bags, tote bags, carryall bags,

<u>TRADEMARK</u>	<u>REGISTRATION NUMBER</u>	<u>REGISTRATION DATE</u>	<u>GOODS</u>
			traveling bags, hand bags, leather bags for computers and cameras; wallets and purses; toiletry bags sold empty and cosmetic bags sold empty; brief cases, satchels and portfolios; cases for personal organizers and for mobile telephones; umbrellas, leather key fobs, leather key holders, and dog coats.
EQUESTRIAN KNIGHT DEVICE w/ B PRORSUM	863,179	7-Jan-1969	Coats, topcoats, jackets, suits, trousers, slacks, shorts, overalls, skirts, capes, hats, caps, bonnets, hoods, berets, neckties, stockings, socks, belts, boots, shoes, slippers, sandals, gloves, shirts, collars, pajamas, dressing gowns, cardigans, sweaters, pullovers, scarves, blouses, beach robes, dresses, skiwear, and handkerchiefs.
EQUESTRIAN KNIGHT DEVICE w/ B PRORSUM	1,622,186	13-Nov-1990	Sunglasses; spectacles; frames and lenses.
EQUESTRIAN KNIGHT DEVICE w/ B PRORSUM	2,952,399	17-May-2005	Sunglasses, combined sunglasses, spectacles, optical glasses, fitted frames and lenses for the aforesaid goods; cases and holders for the aforesaid goods; parts and fittings for all the aforesaid goods; computer carrying cases and specialty holsters and cases for carrying mobile telephones; watches, and parts and fittings for all the aforesaid goods, wrist watches and straps and bracelets therefor and jewelry, imitation jewelry, tie-pins and cuff links; and jewelry boxes, all made of precious metal or coated therewith.
EQUESTRIAN KNIGHT DEVICE w/ B PRORSUM	4,036,908	11-Oct-2011	Accessories for covers, and accessory charms for mobile electronic devices; cases and holders for telephones, mobile telephones and mobile electronic devices, namely, smart phones, personal entertainment devices, tablet computers.
EQUESTRIAN KNIGHT DEVICE w/ BB PRORSUM	1,903,508	4-Jul-1995	Watches and parts therefor; bracelets for wrist watches; jewelry; costume jewelry; tie pins and cuff links.
EQUESTRIAN KNIGHT DEVICE w/ BB PRORSUM	3,766,097	30-Mar-2010	Textiles and textile goods, namely, household linen, bed linen, bath linen, bed blankets, blanket throws, children's blankets, beach towels, handkerchiefs, unfitted fabric furniture


<u>TRADEMARK</u>	<u>REGISTRATION NUMBER</u>	<u>REGISTRATION DATE</u>	<u>GOODS</u>
			covers, fabrics for textile use and textile used as lining for clothing, cushion covers.
TB DEVICE	6,376,182	08-Jun-2021	<p>Leather and imitations of leather bags, namely, handbags, shoulder bags, tote bags, clutch bags, holdalls, travel bags, waist bags, weekend bags, school bags, overnight bags; articles of luggage, namely, trunks being luggage, trunks being travelling trunks; valises, suitcases, travelling bags, garment bags for travel, vanity cases sold empty; allpurpose carrying bags, athletic and sports bags, beach bags, carry-on bags, duffel and gym bags, overnight bags, school book bags, satchels, bum-bags; textile, string, leather, reusable, canvas, and mesh shopping bags; baby bags, namely, baby carrying bags, bags for carrying babies' accessories, nappy bags; baby carriers worn on the body, pouch baby carriers; baby harnesses being baby carriers worn on the body, baby harnesses being leashes for guiding children; wheeled shopping bags, trolleys in particular general purpose sport trolley bags; purses; drawstring, felt, leather, textile, and cloth pouches; wallets; cosmetic cases and bags sold empty, cases for manicure sets sold empty; key holders being key cases made of leather or imitations of leather, key holders being pouches for holding keys; card holders being credit card holders, business card holders in the nature of card cases, and business cardholders in the nature of wallets; labels of leather for luggage, and luggage labels made of leather and imitations of leather, leather tags; pochettes; tie cases; leather boxes; umbrellas, parasols; clothing for pets; horse blankets; collars and leashes for animals; clothing, namely, coats, finished detachable coat linings, rainwear, ponchos, jackets, gilets, jerseys, jumpers, sweaters, blouses, shirts, polo shirts, t-shirts, vests, tank tops, waistcoats, dresses, skirts, trousers, jeans, shorts, ski wear, ski gloves, sports shirts, sports trousers, sports singlets, sweat shirts; waterproof clothing, namely, bathing trunks, swimming trunks, trunks being clothing; bikinis, sarongs, swimwear, bathrobes, boxer shorts, loungewear, nightwear, undergarments, ties as clothing, cravats, leggings, pashmina shawls; children's and infant's clothing, namely, coats, jackets, ponchos, jerseys, sweaters, blouses, shirts, t-</p>

<u>TRADEMARK</u>	<u>REGISTRATION NUMBER</u>	<u>REGISTRATION DATE</u>	<u>GOODS</u>
			shirts, vests, dresses, skirts, trousers, jeans, shorts, children's headwear, children's swimwear, children's nightwear, children's under garments, and one-piece clothing; cloth bibs; footwear, shoes, boots, athletic footwear, slippers, ballet slippers; headwear, namely, caps, baseball caps, hats, head scarves; belts, gloves, mufflers as neck scarves, scarves, shawls, stoles, pocket squares; belts being clothing
TB MONOGRAM	6,513,734	12-Oct-2021	Non-medicated toilet preparations, namely, cosmetics; glitter for cosmetic purposes; non-medicated toilet preparations, namely, cosmetics; glitter for cosmetic purposes; cosmetic preparations for the bath and shower; non-medicated body and skin care preparations, namely, creams, lotions, gels, toners, cleaners and peels; cosmetic preparations for the care of teeth and for hair; nail care preparations and nail polish, false nails; non-medicated soaps; anti-perspirants, deodorants for personal use; perfumes, eau de cologne, eau de toilette, toilet water and aftershave; essential oils, massage oil; pot pourri, room fragrances and incense; cleaning preparations for leather goods and care preparations for leather goods, namely, conditioners, balms, creams, waxes and polish; sunglasses, spectacles, optical glasses, fitted frames and lenses for sunglasses, spectacles and optical glasses; cases and holders for sunglasses, spectacles and optical glasses; parts and fittings for sunglasses, spectacles and optical glasses, namely, frames; cases and holders for portable electronic devices, namely, mobile phones, tablets, electronic book readers, and digital book readers; mobile telephones, portable audio and video systems and computers; mouse mats; camera cases; portable electronic devices, electronic book readers, portable music readers and tablets; mobile phone accessories, namely, mobile phone covers and skins, lanyards for mobile phones, mobile phone fascias; watches, clocks and parts, fittings and cases for all the aforesaid goods; watch straps and bracelets therefor; jewellery, imitation jewellery, tie-pins, tie clips and cuff links; articles made of precious metals or coated therewith, namely key rings, jewellery charms, badges, shoe jewellery; jewellery boxes and cases; models figures being ornaments and figures of



<u>TRADEMARK</u>	<u>REGISTRATION NUMBER</u>	<u>REGISTRATION DATE</u>	<u>GOODS</u>
			<p>precious metal; jewellery rolls; key holders and key rings of precious and semi-precious metals; key chains and charms therefor; jewellery rolls; cufflink cases; leather and imitation leather; bags, namely, holdalls, handbags, shoulder bags; trunks being luggage, valises, suitcases, travelling bags, garment bags for travel, bumbags, vanity cases sold empty, baby carrying bags, baby carriers worn on the body, baby harnesses, namely, harnesses for guiding children, rucksacks, satchels; canvas, textile, leather or mesh shopping bags, wheeled shopping bags and general purpose sport trolleys bags; purses, pouches made out of cloth; wallets, credit card holders, pochettes; labels of leather and luggage labels, leather baggage tags; cosmetic cases and bags sold empty, cases for manicure sets sold empty; tie cases; leather boxes; umbrellas, parasols; clothing for pets; horse blankets; collars and leashes for animals; textiles and textile items, namely, fabrics, namely, bed blankets; bed covers; bed linen; cot linen; duvets; mattress covers; pillowcases; quilts and eiderdowns; bed sheets; curtains; towels; face cloths; table linen; plastic table covers; placemats of textile; unfitted fabric furniture covers, curtains, textile wall hangings, cushion covers; textile handkerchiefs; travelling rugs, picnic blankets; pet blankets; textile labels; clothing articles and outer clothing articles, namely, coats, jackets, rainwear, ponchos, gilets, detachable coat linings, raincoats, blousons; casual coats; polo shirts; blouses; t-shirts; dresses; pajamas; knitwear, namely, jerseys, jumpers, cardigans, sweaters, knitted leggings; shorts; trousers; suits for men women and children; skirts; jackets; jackets containing microprocessors; articles of underclothing, namely, boxer shorts, lingerie, loungewear, nightwear, underwear, undergarments, hosiery; sports clothing, namely, ski wear, sports jackets, sports jerseys, sports shirts, sports trousers, sweat pants, sweat shirts, sweat shorts, tracksuits, tennis wear, swimwear; sports footwear; tracksuits, ready-made linings, namely, finished textile linings for garments; ties; clothing belts; clothing wraps; serapes; scarves; shawls and stoles; gloves, footwear, headgear in the nature of headwear, belts, shirts, jeans; retail store and wholesale</p>

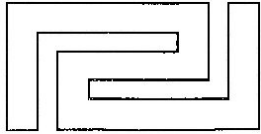

<u>TRADEMARK</u>	<u>REGISTRATION NUMBER</u>	<u>REGISTRATION DATE</u>	<u>GOODS</u>
			<p>store services for clothing, footwear, headgear, bags, vanity cases sold empty, satchels, bumbags, purses, pouches, wallets, key holders, card holders, pochettes, labels and luggage labels, leather tags, leather belts, cosmetic cases and bags not fitted, cases for manicure sets sold empty, card cases, card holders, tie cases, cufflink cases, leather boxes, umbrellas, cases and holders for sunglasses and eyewear, cases and holders for portable electronic devices, cases and holders for mobile telephones, camera cases, phone covers and skins, charms and lanyards for mobile phones, mobile phone fascias, key rings and charms, diaries, notebooks, pen and pencil cases, pen holders, passport covers, paperweights, keyrings, homeware, perfumes, toiletries and cosmetics, watches, jewellery, eyewear and sunglasses.</p>

GIANNI VERSACE S.R.L.

<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REG. NO.</u>	<u>GOODS and SERVICES</u>
VERSACE	Dec. 16, 1997	2121984	<p>Class 3: cosmetics, namely, day cream, bathfoam, after-shave, deodorants for men and women, perfumed, unperfumed (natural) and hypoallergenic perfumes, cologne, toilet water, fragrances, namely, perfume, toilet water and essence oils for personal use for men and women</p> <p>Class 18: leather or imitations of leather, namely, animal skins and hides, handbags, wallets, luggage, attache cases, tote bags, briefcases, all purpose sport bags, travelling trunks and carry-on bags, shoulder bags, garment bags for travelling, keycases, umbrellas</p> <p>Class 25: clothing for men, women and children, namely belts, coats, raincoats, waistcoats, blouses and pullovers, jackets, trousers, skirts, dresses, suits, shirts and chemises, T-shirts, sweaters, underwear, socks and stockings, gloves, ties, scarves, hats and caps, boots, shoes and slippers</p>
VERSACE	Jun. 30, 2020	6088586	Protective cases for cell phones; Protective cases for laptop computers; Protective cases for portable media players
 <p>“Medusa Head Design”</p>	Aug. 2, 2005	2980455	<p>Class 3: Cosmetics, namely night and day creams, cleaning preparations for the care of the face and body, bath-foam, shaving foam, aftershaves, foundation makeup, nail polish, deodorants for men and women, hand and body soaps, hair shampoos and rinses, hair spray, toothpaste and fragrances, namely perfume, toilet water and essential oils for personal use for men and women</p> <p>Class 8: Tableware, namely cutlery; forks, knives and spoons; sterling silver table forks, knives and spoons; domestic fireplace bellows</p> <p>Class 9: Optical instruments, apparatus and equipments, namely eyeglasses; reading glasses, and optical glasses; sunglasses; spectacles; spectacles frames; monocles; lorgnettes</p> <p>Class 11: Apparatus for lighting, namely, electric lighting fixtures for use on ceilings, chandeliers, electric, incandescent, and halogen light bulbs, safety lamps, candle, electric, oil, and portable paper lanterns, standard lamps; fireplaces; decorative water fountains; lamps</p>


<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REG. NO.</u>	<u>GOODS and SERVICES</u>
			<p>Class 14: Articles made of precious metals and alloys of precious metals with or without precious stones, namely rings, necklaces, bracelets, brooches, earrings, tie clips, cuff-links, diamonds, jewelry cases made of precious metal, watches, clocks, chronometers, watch cases, costume jewelry</p> <p>Class 18: Leather and imitation of leather sold in bulk, handbags, wallets, luggage, attache cases, tote bags, briefcases, sport bags, traveling trunks, carry-on bags, shoulder bags, garment bags for traveling, key cases, umbrellas, parasols, walking sticks, whips, harnesses, saddlery; leather key chains</p> <p>Class 19: Fireplace surround; floor tiles; wood tile floors; glass tiles; parquet flooring; statuettes of stone, concrete, or marble; non-metal wall panels</p> <p>Class 20: Furniture; mirrors, namely looking glasses; picture frames; chairs; cupboards; cushions; desks; divans; plastic and wood doorknobs; figures of bone, ivory, plaster, plastic, wax and wood; plastic and wood furniture handles for doors, plastic key chains; magazine racks; office furniture; pillows; fitted furniture covers</p> <p>Class 21: Household or kitchen utensils and containers, namely, dinnerware; beverage-ware; glassware; sugar bowls; beer mugs; bottle openers; bowls; candle holders not of precious metal; china ornaments; cookware, namely non-electric frying pans; corkscrews; soap dispensers; figurines in China, crystal, earthenware, glass, porcelain and terracotta; holders for flowers and plants; perfume atomizers sold empty; plates; pots; soapboxes; soap holders; vases; flower baskets; porcelain and earthenware doorknobs and furniture handles for doors</p> <p>Class 24: Fabric for textile use, fabric of imitation animal skins, fabric for boots and shoes, bath linen; bed linen; blankets; curtains; unfitted furniture covers; handkerchiefs; kitchen towels; textile wall hangings</p> <p>Class 25: Clothing for men, women and children, namely belts, coats, raincoats,</p>

<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REG. NO.</u>	<u>GOODS and SERVICES</u>
			<p>waistcoats, blouses and pullovers, jackets, trousers, skirts, dresses, suits, shirts and chemises, T-shirts, sweaters, underwear, socks and stockings, gloves, ties, scarves, hats and caps, boots, shoes and slippers</p> <p>Class 27: Carpets, rugs, mats and matting, linoleum and other materials for covering existing floors; non-textile wall hangings; non-textile wall decorations</p>
 <p>“Medusa Head Design”</p>	Dec. 17, 2019	5937934	<p>Class 9: Protective cases for cell phones; Protective cases for laptop computers; Protective cases for portable media players</p>
 <p>“Greca Design”</p>	Jan. 2, 2007	3194501	<p>Class 3: bath foam, deodorants for men and women, fragrances, namely, perfume, toilet water</p> <p>Class 9: glasses, sunglasses, spectacles, spectacle frames, and cases</p> <p>Class 14: Articles made of precious metals and alloys of precious metals, with or without precious stones, namely, rings, necklaces, bracelets, earrings, tie clips, cuff-links, watches, costume jewellery</p> <p>Class 16: writing and marking instruments, namely, pens</p> <p>Class 18: Leather and imitation leather goods, namely, handbags, wallets, luggage, attaché cases, tote bags, briefcases, sport bags, traveling trunks, carry-on bags, shoulder bags, garment bags for traveling</p> <p>Class 24: Fabric for textile use, fabric for boots and shoes, bath linen, bed linen; bed blankets; unfitted fabric furniture covers</p> <p>Class 25: Clothing for men, women and children, namely belts, coats, raincoats, waistcoats, blouses and pullovers, jackets, trousers, skirts, dresses, suits, shirts and chemises, t-shirts, sweaters, underwear, socks and stockings, gloves, ties, scarves, hats and caps, boots, shoes and slippers</p>

<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REG. NO.</u>	<u>GOODS and SERVICES</u>
 “Greca Element Design”	Jun. 24, 2008	3453992	<p>Class 3: bath foam, after shaves, deodorants for men and women, fragrances, perfume</p> <p>Class 9: glasses, sunglasses, spectacles</p> <p>Class 18: Leather and imitation leather goods, namely, handbags, wallets, luggage, tote bags, key cases</p> <p>Class 20: Furniture; mirrors, namely, looking glasses; cushions; desks; divans; office furniture; pillows; parts and fittings for the aforesaid furniture goods, namely, fitted furniture covers not of paper</p> <p>Class 24: bath linen; bed linen; bed blankets</p> <p>Class 25: Clothing for men, women and children, namely, belts, coats, waistcoats, blouses and pullovers, jackets, trousers, skirts, dresses, shirts and chemises, T-shirts, underwear, socks and stockings, gloves, ties, scarves, hats and caps, shoes and slippers</p> <p>Class 26: clothing buttons</p>
 “Lion Head Design”	Apr. 4, 2017	5173618	<p>Class 3: Cosmetics, including night and day creams; preparations for cleaning the face and body; bath foam; shaving foam after shave; make-up foundations; lip gloss; shoe wax; mascara; cosmetic masks; eyebrow pencils; pencils for cosmetic purposes, nail varnish; deodorants for men and women, hand and body soap, shampoo and hair coloring preparations in the nature of tints; hair lotions and lotions for cosmetic purposes; hair lacquers; dentifrices, fragrances; perfumery, eau de Cologne, lavender water, scented water being perfumery and essential oils for personal use, for men and women; bases for flower perfumes in the nature of essential oils; sun-tanning preparations being cosmetics; cosmetic preparations for baths; feminine hygiene cleansing towelettes; feminine deodorant sprays; skincare cosmetics; make-up preparations; cleaning agents for household purposes; shaving preparations; non-medicated toiletries; make-up removing preparations; talcum powder, for toilet use</p> <p>Class 9: Optics, namely, spectacles; sunglasses, optical glasses; goggles for sports; optical frames; monocles; theatre glasses; optical goods, namely, glasses and lenses; containers for contact lenses; eyeglasses cases; pince-nez</p>

<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REG. NO.</u>	<u>GOODS and SERVICES</u>
			<p>cords; optics, namely, magnifying glasses; correcting optical lenses; optical lenses; lenses for eyeglasses; frames for glasses; electronic schedulers in the nature of electronic agendas; computers, handheld computers; data processing equipment in the nature of a computer mouse; mouse mats; computer keyboards; portable telephones; downloadable ring tones for mobile phones; cell phone straps</p> <p>Class 14: Jewelry, precious stones; horological and chronometric instruments; rings being jewelry; cuff links; bracelets being jewelry; watch bands; watch cases; clock cases; watch chains; jewelry chains; pendants; necklaces being jewelry; chronographs for use as timepieces; timepieces; stopwatches; chronoscopes; diamonds; tie pins; figurines in the nature of statuettes of precious metal; gold thread jewelry; wire of precious metal, namely, precious metal jewelry chains; silver thread jewelry; cloisonné jewelry; badges of precious metal; clock hands for clock- and watchmaking; alloys of precious metal; ingots of precious metals; movements for clocks and watches; medals; lockets being jewelry; earrings; jewelry of yellow amber, ivory jewelry; jewelry ornaments; ornaments of jet; shoe ornaments of precious metal; hat ornaments of precious metal; pendulum clocks; atomic clocks; wristwatches; pocket watches; master clocks; electric clocks and watches; jewelry stones; trinkets or fobs, namely, key rings of precious metal; dials for clock and watch making; boxes of precious metal; cases for clock- and watchmaking; jewelry cases, namely, jewelry caskets and boxes; presentation cases for watches, namely, cases adapted for holding watches; pins being jewelry; ornamental pins; jewelry brooches; statuettes of precious metal; paste jewelry being costume jewelry; time instruments, namely, watches, clocks; alarm clocks; watch crystals</p> <p>Class 18: Leather and imitations of leather; animal skins, hides; women's handbags; pocket wallets; luggage; garment carriers in the nature of garment bags for travel; rucksacks; document cases; sports bags; trunks being luggage; travelling trunks; carry-on bags; sling bags; clothing bags in the nature of garment bags for travel; valises; suitcases; attaché cases; purses; travelling handbags; notecases, namely,</p>


<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REG. NO.</u>	<u>GOODS and SERVICES</u>
			<p>business card cases; key cases; umbrellas; parasols; beach parasols; walking sticks; alpenstocks; whips; harness for horses; saddlery</p> <p>Class 25: Clothing, namely shirts, pants, jeans, sweaters, skirts, dresses; footwear; headgear, namely, headwear; clothing of imitations of leather, namely, pants, jackets; clothing of leather, namely, pants, jackets; motorists' clothing, namely, motorists' jackets, driving gloves; cyclists' clothing, namely, biking shorts, athletic shirts, cycling gloves; clothing for gymnastics, namely, leotards, leggings; gowns; bath robes; bandanas being scarves; berets; underclothing; smocks, boas being necklets; teddies being undergarments; garters; sports shoes; stockings; slippers; socks; jodhpurs; short-sleeve shirts; stuff jackets being clothing; top hats; coats; hoods being clothing; belts for clothing; money belts being clothing; tights; collars being clothing; detachable collars; suits; beachwear; ties; ascots; headbands for clothing; pocket squares; dress handkerchiefs in the nature of pocket squares; jackets being clothing; jumper dresses; girdles; gloves being clothing; arm length gloves; mackintoshes; knitwear, namely knit shirts, knit skirts, knit dresses, knit sweaters, knit jackets; jersey clothing, namely, shirts, pants, dresses; leg warmers; leggings being trousers; liveries; sports jerseys; hosiery; swimsuits; pullovers; muffs being clothing; maniples; pelerines; mantillas; sleep masks; miniskirts; cowls being clothing; boxer shorts; bathing drawers; vests, trousers; parkas; pelisses; furs, namely, fur cloaks, fur coats; shirt yokes; pajamas; wristbands being clothing; ponchos; sock suspenders; brassieres; sandals; bath sandals; shoes; bath slippers; gymnastic shoes; beach shoes; shawls; sashes for wear, underpants; wimples; topcoats; outerclothing, namely, jackets, coats, vests; petticoats; slips being undergarments; shirt fronts; ankle boots; boots; fur stoles; T-shirts; combinations being clothing; uniforms; veils being clothing; visors being headwear; wooden shoes</p> <p>Class 26: Lace and embroidery, ribbons and braids; buckles for clothing; shoe fasteners; blouse fasteners, namely, snaps and buttons for blouses; shoe buckles; frills for attachment to clothing; lace for edgings for clothing; hook and eye fastening tape; clothing hooks; hooks for corsets; shoe hooks; tinsels as trimmings for</p>





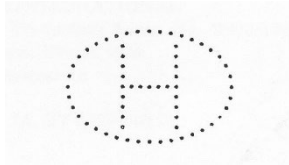

<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REG. NO.</u>	<u>GOODS and SERVICES</u>
			<p>clothing; buttons; stud buttons for duvets; stud buttons for shoes; collar studs, namely collar stays; snap fasteners; pins, namely bonnet pins, hair pins, hat pins and needles; borders and edgings for clothing; hem tape for clothing</p> <p>Class 35: Advertising services; business management; business administration services; providing office functions; dissemination of advertisements; dissemination of advertising matter; rental of advertising space; commercial and industrial business management assistance and consultancy; professional business consulting; modelling for advertising or sales promotion; franchising, namely, services rendered by a franchisor, that is transfer of business and organizational consultancy assistance in the development and management of a commercial enterprise; provision of information concerning commercial sales of fashion goods; retail store services and on-line retail store services for others featuring cosmetics, spectacles, mobile telephones, jewelry, clocks and watches, bags, accessories of leather, clothing, footwear, haberdashery articles; presentation of goods on communications media, namely, providing television home shopping services in the field of general consumer merchandise; electronic commerce services, namely, providing information about products via telecommunication networks for advertising and sales purposes; online retail store services featuring cosmetics, spectacles, mobile telephones, jewelry, clocks and watches, bags, accessories of leather, clothing, footwear, haberdashery articles; retail store services and wholesale store services featuring cosmetics, spectacles, mobile telephones, jewelry, clocks and watches, bags, accessories of leather, clothing, footwear, haberdashery articles</p>
 <p>“Lion Head Design”</p>	Aug. 1, 2017	5253199	<p>Class 14: Jewellery, precious stones; horological and chronometric instruments; jewelry, namely, rings; cuff links; jewelry, namely, bracelets; watch bands; watch cases being parts of watches; clock cases being parts of clocks; watch chains; jewelry chains; pendants; jewelry, namely, necklaces; chronographs as watches; timepieces; stopwatches; chronoscopes; diamonds; tie pins; figurines, namely, statuettes of precious metal; gold thread jewelry; jewelry, namely, wire in the nature of threads of precious metal; jewelry,</p>


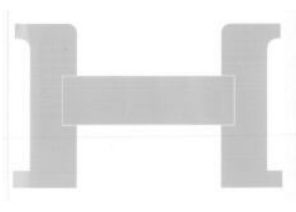
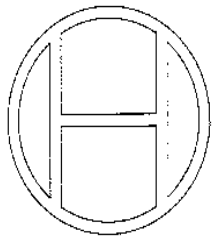


<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REG. NO.</u>	<u>GOODS and SERVICES</u>
			<p>namely, silver thread; jewellery; jewelry, namely, cloisonné jewellery; badges of precious metal; clock- and watchmaking items, namely, clock hands; alloys of precious metal; ingots of precious metals; movements for clocks and watches; medals; jewelry, namely, lockets; earrings; jewellery of yellow amber; ivory jewelry; jewelry, namely, ornaments; ornaments of jet; shoe ornaments of precious metal; hat ornaments of precious metal; pendulum clocks; atomic clocks; wristwatches; pocket watches; master clocks; electric clocks and watches; jewellery stones; key rings in the nature of trinkets and fobs of precious metal; dials for clock-and-watch-making; boxes of precious metal; cases for clock- and watchmaking, namely, cases being parts of watches and clocks; jewelry cases in the nature of caskets or boxes; presentation cases for watches being parts of watches; pins being jewelry; ornamental pins; jewelry, namely, brooches; statuettes of precious metal; costume jewelry, namely, paste jewelry; time instruments, namely, watches, clocks; alarm clocks; watch crystals</p> <p>Class 18: Leather and imitations of leather; animal skins and hides; women's handbags; pocket wallets; luggage; garment carriers, namely, garment bags for travel; rucksacks; document cases; sports bags; luggage, namely, trunks; travelling trunks; carry-on bags; sling bags; garment bags for travel; valises; suitcases; attaché cases; purses; travelling handbags; business card cases; key cases, umbrellas; parasols; beach parasols; walking sticks; alpenstocks; whips; harness for horses; saddlery</p> <p>Class 25: Clothing, namely, shirts, pants, jeans, sweaters, dresses; footwear; headgear, namely, headwear, hats, caps; clothing of imitations of leather, namely, pants, jackets; clothing of leather, namely, pants, jackets; motorists' clothing, namely, motorists' jackets; cyclists' clothing, namely, biking shorts, athletic shirts, bicycling gloves; clothing for gymnastics, namely, leotards, leggings, gymnastic shoes; gowns; bath robes; scarves, namely, bandanas; berets; underclothing; smocks; necklets, namely, boas; undergarments, namely, teddies; garters; sports shoes; stockings; slippers; socks; jodhpurs; short-sleeve shirts; shirts; clothing, namely, stuff jackets; top hats; coats; clothing,</p>

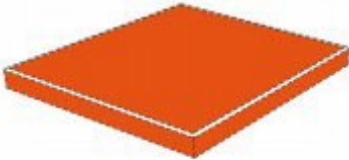
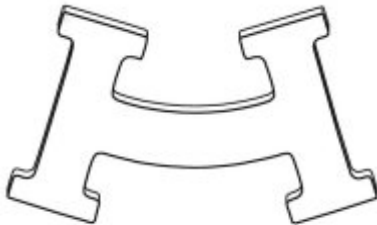
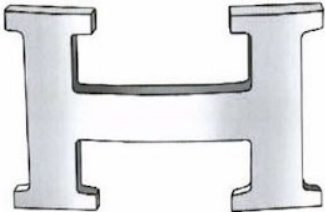
<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REG. NO.</u>	<u>GOODS and SERVICES</u>
			<p>namely, hoods; belts for clothing; clothing, namely, money belts; tights; clothing, namely, collars; detachable collars; suits; beachwear; ties; ascots; headbands for clothing; pocket squares; dress handkerchiefs, namely, pocket squares; clothing, namely, jackets; skirts; jumper dresses; girdles; clothing, namely, gloves; arm length gloves; mackintoshes in the nature of raincoats; knitwear, namely, knit shirts, knit skirts, knit dresses, knit sweaters, knit jackets; clothing, namely, jerseys; leg warmers; trousers, namely, leggings; liveries; sports jerseys; hosiery; swimsuits; pullovers; clothing, namely, muffs; maniples; pelerines; mantillas; sleep masks; miniskirts; clothing, namely, cowls; boxer shorts; bathing drawers; vests; trousers; parkas; pelisses; fur clothing, namely, fur jackets, fur coats, fur cloaks; shirt yokes; pyjamas; clothing, namely, wristbands; ponchos; sock suspenders; brassieres; sandals; bath sandals; shoes; bath slippers; gymnastic shoes; beach shoes; shawls; sashes for wear; underpants; wimples; topcoats; outerclothing, namely, jackets, coats, vests; petticoats; undergarments, namely, slips; shirt fronts; ankle boots; boots; fur stoles; T-shirts; clothing, namely, combinations; uniforms; clothing, namely, veils; headwear, namely, visors; wooden shoes</p> <p>Class 26: Lace and embroidery, ribbons and braids; clothing accessories, namely, clothing buckles; shoe fasteners; blouse fasteners; shoe buckles; frills for attachment to clothing; lace for edgings; hook and eyes; haberdashery, namely, clothing hooks; hooks for corsets; shoe hooks; tinsels in the nature of lace as trimmings for clothing; buttons; press buttons for duvets; press buttons for shoes; snap fasteners; pins, namely, bonnet pins, hair pins, hat pins and needles; borders and edgings for clothing; items for hems on clothing, namely, hem tape</p>

HERMÈS INTERNATIONAL

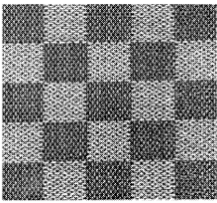
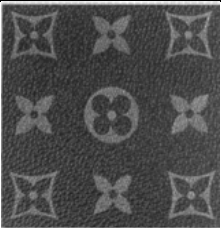
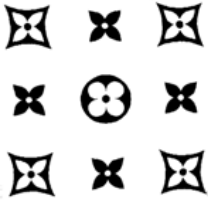
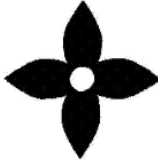
<u>OWNER</u>	<u>TRADEMARK</u>	<u>Reg. Date</u>	<u>Reg. No.</u>	<u>REGISTRAR</u>	<u>Classes</u>
HERMES INTERNATIONAL	HERMÈS	2/29/1972	930149	USA	03
HERMES INTERNATIONAL		1/22/2013	4278653	USA	3, 6, 8, 9, 11, 12, 14, 16, 18, 20, 21, 22, 24, 25, 26, 27, 28, 34, 35, 41
HERMES INTERNATIONAL		12/29/1998	2213940	USA	08, 09, 21, 28, 34
HERMES INTERNATIONAL		6/27/1939	368785	USA	08, 14
HERMES INTERNATIONAL		7/18/1939	369271	USA	14
HERMES INTERNATIONAL		8/1/1939	369681	USA	18
HERMES INTERNATIONAL		8/4/1987	1450841	USA	20
HERMES INTERNATIONAL		8/15/1939	370082	USA	21
HERMES INTERNATIONAL		3/9/1971	909653	USA	24
HERMES INTERNATIONAL		8/8/1939	369944	USA	25
HERMES INTERNATIONAL		10/8/1968	858299	USA	25
HERMES INTERNATIONAL		1/16/2007	3198963	USA	35
HERMES INTERNATIONAL		12/27/2005	3036116	USA	35
HERMES INTERNATIONAL		8/15/1978	1099896	USA	42
HERMES INTERNATIONAL		5/1/2001	2447278	USA	08, 09, 16, 20, 24, 28, 34
HERMES INTERNATIONAL		10/8/1985	1364533	USA	21
HERMES INTERNATIONAL		1/6/1970	883588	USA	03, 14, 18, 25
HERMES INTERNATIONAL		1/16/2007	3198973	USA	35
HERMES INTERNATIONAL		12/27/2005	3036117	USA	35
HERMES INTERNATIONAL		9/24/2002	2623070	USA	37, 40, 41
HERMES INTERNATIONAL		8/15/1978	1099897	USA	42



HERMES INTERNATIONAL		9/4/1984	1292597	USA	03, 09, 14, 16, 18, 24, 25, 28, 34
HERMES INTERNATIONAL		5/27/1975	1011908	USA	14
HERMES INTERNATIONAL		11/23/1993	1806107	USA	18
HERMES INTERNATIONAL		3/20/2001	2436099	USA	03, 08, 09, 14, 16, 18, 20, 24, 25, 28, 34
HERMES INTERNATIONAL		9/6/2005	2991927	USA	16, 18
HERMES INTERNATIONAL		12/4/2007	3348789	USA	06, 08, 14, 16, 18, 21, 24, 25, 26, 28, 34
HERMES INTERNATIONAL		1/20/2009	3564868	USA	06, 08, 14, 16, 18, 20, 21, 22, 24, 25, 26, 28, 34
HERMES INTERNATIONAL	TERRE D'HERMES	4/11/2006	3079963	USA	03

HERMES INTERNATIONAL		4/27/2007	3233558	USA	06, 14, 18, 25, 26
HERMES INTERNATIONAL		4/27/2007	3233557	USA	06, 14, 18, 25, 26
HERMES INTERNATIONAL	LINDY	48/5/2008	3480825	USA	18
HERMES INTERNATIONAL		1/13/2009	3561331	USA	06, 14, 16, 18, 21, 25, 26, 34
HERMES INTERNATIONAL		3/29/2011	3936105	USA	18
HERMES INTERNATIONAL		4/5/2011	3939358	USA	18


HERMES INTERNATIONAL		7/26/11	4000067	USA	3, 14, 18, 25, 35
HERMES INTERNATIONAL		2/17/2015	4687132	USA	25, 26
HERMES INTERNATIONAL		7/21/2020	6105385	USA	14, 18, 25, & 26







LOUIS VUITTON MALLETIER

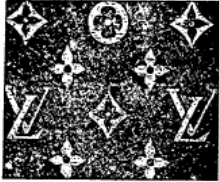

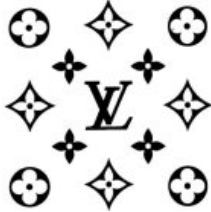
TRADEMARK	REGISTRATION DATE	REGISTRATION NUMBER	GOODS and SERVICES
 <p>Damier Trademark</p>	2/17/2009	3576404	IC 018. G & S: Boxes of leather or imitation leather for packaging and carrying goods, trunks, suitcases, traveling sets comprised of matching luggage, traveling bags, luggage, garment bags for travel, toiletry cases sold empty, rucksacks, satchels, handbags, beach bags, leather shopping bags, sling bags, suit carriers, shoulder bags, waist bags, purses, travel cases, briefcases, briefcase-type portfolios, leather pouches, wallets, change purses, key cases, business card cases, calling card cases.
 <p>Décor Floral</p>	6/28/1994	1841850	IC 018. G & S: trunks; travelling trunks; suitcases; bags; namely, traveling bags; bags for climbers; bags for campers; rucksacks; haversacks; shopping bags; handbags; vanity cases; attache cases, satchels; pouches; briefcases; wallets; pocket wallets; card cases; bill and card holders; key holders; change purses; portfolios; and umbrellas.
 <p>Décor Floral</p>	6/20/2006	3107072	<p>IC 09. G & S: Spectacles, sunglasses and spectacle cases.</p> <p>IC 018. G & S: Leather and imitation leather products, namely, traveling bags, traveling sets comprised of bags or luggage, trunks and suitcases, garment bags for travel purposes; vanity cases sold empty, rucksacks, shoulder bags, handbags, attaché cases, document wallets and briefcases made of leather, pouches made of leather, wallets, purses, business card cases, credit card cases; umbrellas.</p> <p>IC 025. G & S: Clothing and undergarments, namely, belts, scarves shawls, jackets, sashes for wear, shoes, boots.</p>
 <p>Flower</p>	8/4/1998	2177828	IC 014. G & S: goods made of precious metals, namely, shoe ornaments, ornamental pins; jewelry, namely, rings, ear rings, cufflinks, bracelets, charms, necklaces,; horological instruments, straps for watches, watches and wrist-watches, cases for watches

TRADEMARK	REGISTRATION DATE	REGISTRATION NUMBER	GOODS and SERVICES
			<p>IC 018. G & S: goods made of leather or imitations of leather are not included in other classes, namely, boxes made from leather, trunks, valises, traveling bags, luggage for travel, garment bags for travel, vanity cases sold empty, rucksacks, hand bags, beach bags, shopping bags, shoulder bags, attache cases, briefcases, and fine leather goods, namely, pocket wallets, purses, leather key holders, business card cases, calling card cases, and credit card cases, umbrellas.</p> <p>IC 025. G & S: clothing and underwear, namely shawls, stoles, belts, shoes, boots and sandals.</p>
 Flower in circle	8/18/1998	2181753	<p>IC 014. G & S: jewelry, namely, rings, ear rings, bracelets, charms, necklaces, horological instruments, straps for watches, watches and wrist-watches, cases for watches</p> <p>IC 018. G & S: goods made of leather or imitations of leather are not included in other classes, namely, boxes made from leather; trunks, valises, traveling bags, luggage for travel, garment bags for travel, vanity cases sold empty, rucksacks, hand bags, beach bags, shopping bags, shoulder bags, attache cases, briefcases, and fine leather goods, namely, pocket wallets, purses, leather key holders, business card cases, calling card cases, credit card cases, and umbrellas.</p> <p>IC 025. G & S: clothing and underwear, namely, shirts, waistcoats, raincoats, skirts, coats, pullovers, trousers, dresses, jackets, shawls, stoles, scarves, neckties, pocket squares, belts shoes, boots and sandals.</p>
 Flower in Rhombus	10/14/2003	2773107	<p>IC 014. G & S: Jewelry including rings, earrings, cuff links, bracelets, charms, necklaces, and medallions; horological and chronometric instruments and apparatus, namely, watches</p> <p>IC 018. G & S: Travel bags, travel bags made of leather; luggage trunks and valises, garment bags for travel, vanity-cases sold empty; rucksacks, shoulder bags, handbags; attache-cases, briefcases, drawstring</p>




TRADEMARK	REGISTRATION DATE	REGISTRATION NUMBER	GOODS and SERVICES
			<p>pouches, pocket wallets, purses, umbrellas, business card cases made of leather or of imitation leather, credit card cases made of leather or of imitation leather; key holders made of leather or of imitation.</p> <p>IC 025. G & S: Clothing, namely, shirts, T-shirts, belts, scarves, neck ties, shawls, raincoats, overcoats, high-heeled shoes, low-heeled shoes, boots, tennis shoes.</p>
LOUIS VUITTON	8/6/1996	1990760	<p>IC 018. G & S: trunks; traveling trunks; suitcases; traveling bags; luggage; garment bags for travel; hat boxes for travel; shoe bags for travel; umbrellas; animal carriers; rucksacks; haversacks; leather or textile shopping bags; beach bags; handbags; vanity cases sold empty; attache cases; tote bags, travel satchels; clutch bags; briefcases; wallets; pocket wallets; credit card cases; business card cases; bill and card holders; checkbook holders; key cases; change purses; briefcase-type portfolios.</p> <p>IC 025. G & S: shirts; sweatshirts; polo shirts; T-shirts; headwear; jackets; ties; belts; shawls; scarves.</p>
LOUIS VUITTON	8/10/1976	1045932	IC 018 Luggage and ladies' handbags.
LOUIS VUITTON	8/10/1976	4530921	<p>IC 009 G & S: sunglasses; accessories for telephones, mobile phones, smart phones, namely, covers, neck straps, neck cords, and bags and cases specially adapted for holding or carrying portable telephones and telephone equipment and accessories.</p> <p>IC 016 G & S: Paper bags; boxes of cardboard or paper; cardboard and paperboard envelopes and pouches for packaging; posters; postcards; catalogs featuring luggage, travel accessories, bags, small leather goods, and clothing; printed publications, namely, books, and magazines featuring luggage, travel accessories, purses, small leather goods, and clothing; photograph albums; stationery, namely, note pads, note books; diaries; office requisites, namely, paper weights, pencil holders, pen holders, pen cases</p> <p>IC 025. G & S: Clothing, namely, pullovers, vests, shirts, tee-shirts, trousers,</p>





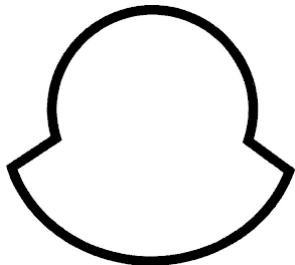

TRADEMARK	REGISTRATION DATE	REGISTRATION NUMBER	GOODS and SERVICES
			jackets, suits, coats, rain coats, waterproof jackets, waterproof pants, overcoats, parkas, skirts, dresses, pajamas, dressing gowns, nightgowns, robe, gloves, neck ties, belts for clothing, leather belts, scarves, pocket squares, sashes for wear, shawls, stockings, socks, tights, braces for clothing, suspenders, stoles, underwear, lingerie, bathing suits; headwear; shoes; slippers; boots; half-boots.
LOUIS VUITTON	12/7/2004	2909003	IC 009 G & S: Optical instruments and apparatus, namely, spectacles, eyeglasses, spectacle cases.
	10/2/1990	1615681	IC 018. G & S: traveling bags, trunks, valises, satchels, hat boxes and shoe boxes for travel, pouches and shoulder bags used for luggage, travel kits and vanity cases sold empty and used for luggage, rucksacks, shopping bags and beach bags in the nature of luggage, hand bags, pocketbooks, briefcases, briefcase-type portfolios, wallets, billfolds, passport cases, key cases, credit card cases, business card cases, change purses.
LOUIS VUITTON PARIS	5/2/2000	2346373	<p>IC 014. G & S: jewelry, namely, rings, belt buckles, cufflinks, bracelets, charms, brooches, necklaces, horological instruments, watches, cases for watches</p> <p>IC 018. G & S: Goods made of leather or of imitations of leather not included in other classes, namely, boxes of leather, trunks, valises, travelling bags, traveling sets for containing cosmetics, garment bags for travel, rucksacks, handbags, beach bags, shopping bags, shoulder bags, briefcases, pouches; fine leather goods, namely, pocket wallets, purses, key cases, card holders, checkbook holders.</p> <p>IC 025. G & S: Clothing and underwear, namely, sweaters, shirts, suits, waistcoats, skirts, coats, pullovers, trousers, dresses, clothing jackets, shawls, stoles, scarves, neckties, clothing belts, bathing suits, footwear; head wear and waterproof clothing, namely, raincoats.</p>



TRADEMARK	REGISTRATION DATE	REGISTRATION NUMBER	GOODS and SERVICES
 LV Logo	9/30/2014	4614736	IC 009. G & S: sunglasses; spectacle cases; accessories for telephones, mobile phones, smart phones, tablet devices, PDAs, and MP3 players, namely, covers, neck straps, neck cords, and bags and cases specially adapted for holding or carrying portable telephones and telephone equipment and accessories.
 LV Logo	9/28/1993	1794905	IC 025. G & S: clothing for men and women; namely belts, shawls, sashes, scarves; footwear headgear.
 LV Logo	1/10/1989	1519828	IC 018. G & S: trunks, valises, traveling bags, satchels, hat boxes and shoe boxes used for luggage, hand bags, pocketbooks.
 LV Logo	6/27/2000	2361695	IC 025. G & S: Clothing, namely, sweaters, shirts, sweatshirts, polo shirts, t-shirts, suits, waistcoats, raincoats, skirts, coats, pullovers, trousers, dresses, jackets, shawls, stoles, scarves, neckties, pocket squares, pocket handkerchief squares for wear, gloves, ties, belts, bathing suits, shoes, boots and sandals, hats.
 LV Logo	12/7/2002	2909002	IC 009 G & S: Optical instruments and apparatus, namely, spectacles, eyeglasses, spectacle cases.
 LV Logo in Circle	5/29/2018	5477535	IC 014. G & S: Jewelry; fashion jewelry, especially precious or semi-precious stones, pearls, rings, earrings, cuff links, bracelets, charms, brooches, necklaces, pendants, key rings of precious metal, tie pins, medallions, jewelry rolls for travel; jewelry boxes; trophies of precious metal; timepieces, watches, wristwatches, watch straps, alarm clocks, stop watches, clock and watch making pendulums and cases or presentation cases for timepieces

TRADEMARK	REGISTRATION DATE	REGISTRATION NUMBER	GOODS and SERVICES
 <p>Toile Monogram</p>	9/20/1932	0297594	IC 018. G & S: trunks, valises, traveling bags, satchels, hat boxes and shoe boxes used for luggage, hand bags, and pocketbooks.
 <p>Toile Monogram</p>	10/31/2000	2399161	IC 025. G & S: Clothing and underwear, namely, shirts, polo shirts, t-shirts, waistcoats, raincoats, skirts, coats, trousers, dresses, jackets, shawls, stoles, scarves, neckties, gloves, ties, belts, bathing suits, shoes, boots and sandals, hats.
 <p>Toile Monogram</p>	08/21/2012	4192541	<p>IC 009 G & S: Sunglasses; spectacles; optical lenses; spectacle cases; accessories for telephones, mobile telephones, smart phones, PC tablets, personal digital assistants, and MP3 players, namely, hands-free kits for telephones, covers, housings, façades, hand straps, and neck straps</p> <p>IC 014. G & S: Jewelry; key rings of precious metal; tie pins; medallions; jewelry boxes; watches; watch bands; alarm clocks; cases for timepieces</p> <p>IC 018. G & S: Boxes of leather or imitation leather for packaging and carrying goods; traveling bags; leather traveling sets of luggage; trunks; suitcases; garment bags for travel; vanity cases sold empty; toiletry bags sold empty; backpacks; handbags; attaché cases; leather document cases; wallets; purses; leather key cases.</p> <p>IC 025. G & S: Clothing, namely, underwear, shirts, tee-shirts, pullovers, skirts, dresses, trousers, coats, jackets, belts for clothing, scarves, sashes for wear, gloves, neckties, socks, bathing suits; footwear; headwear.</p>

MONCLER S.P.A.

<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REG. NO.</u>	<u>CLASSES OF GOODS & SERVICES</u>
MONCLER	February 15, 1966	803,943	25
	May 4, 2010	3,784,896	9, 18, 25
	September 30, 2014	4,611,915	9, 35
	November 14, 2017	5,332,131	14, 18, 25
	May 22, 2018	5,472,359	3
	May 29, 2018	5,477,770	16, 22, 26, 34
	July 3, 2018	5,505,327	24
	December 18, 1973	975,069	25
	January 29, 2019	5,663,709	9, 42, 45
	December 20, 2016	5,102,608	12, 20, 32

<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REG. NO.</u>	<u>CLASSES OF GOODS & SERVICES</u>
	May 24, 2011	3,964,502	25
	February 11, 2014	4,479,319	9, 18, 28
	January 12, 2010	3,737,147	9, 18, 25
	April 30, 2013	4,326,394	26
	October 7, 2014	4,615,701	9
	June 21, 2016	4,980,459	35
	December 27, 2016	5,107,222	14
	June 13, 2017	5,220,625	3
	February 9, 2010	3,746,977	9, 18, 25
	July 16, 2016	4,995,553	3, 9, 25
	January 5, 2021	6,236,025	18
	June 15, 2021	6,383,079	3
	April 17, 2018	5,445,480	25

<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REG. NO.</u>	<u>CLASSES OF GOODS & SERVICES</u>
	October 22, 2019	5,887,712	3, 9, 14, 16, 18, 25, 28, 35, 41, 42
	February 19, 2019	5,677,402	9, 18, 25, 35

PRL USA HOLDINGS, INC.


<u>Trademark</u>	<u>Registration No.</u>	<u>Registration Date</u>	<u>Goods</u>
POLO	1,363,459	10/1/85	Clothing-namely, suits, slacks, trousers, shorts, wind resistant jackets, jackets, blazers, dress shirts, sweatshirts, sweaters, hats, belts, socks, blouses, skirts, coats, and dresses.
POLO BEAR	5,565,986	4/2/2018	Sweaters, sweatshirts, t-shirts, outerwear, mesh shirts, shorts, swim trunks, ties, hats, socks, footwear, gloves, scarves.
POLO BEAR	5,752,831	4/2/2018	Backpacks; tote bags; wallets
POLO BEAR	6,114,023	7/28/20	Watches; decorative key fobs
POLO	1,446,173	7/7/87	Frames for prescription and non-prescription lenses, and complete sunglasses.
RALPH LAUREN	1,447,282	7/14/87	Frames for prescription and non-prescription lenses and complete sunglasses.
POLO BY RALPH LAUREN and Design	1,508,314	10/11/88	Men's suits, slacks, ties, sweaters, jackets, coats, shoes, shirts, hats, belts and socks and ladies' blouses, skirts, suits and dresses.
RALPH LAUREN word mark	1,624,989	11/27/90	Clothing – namely, suits, slacks, trousers, shorts, wind resistant jackets, jackets, blazers, dress shirts, knit shirts, sweatshirts, sweaters, hats, belts, socks, blouses, skirts, coats and dresses.
RALPH LAUREN	1,835,393	5/10/94	Jewelry.
DOUBLE RL	1,876,705	1/31/95	Wearing apparel; namely, jeans, jackets, T-shirts, sweaters, slacks, woven shirts, vests, ties, hats, sweatshirts, overalls and belts.
RRL (STYLIZED)	1,891,143	4/25/95	Wearing apparel; namely, jeans, jackets, T-shirts, sweaters, slacks, woven shirts, vests, ties, hats, sweatshirts, overalls and belts.
RRL RALPH LAUREN EST. 1993 and Design	1,932,955	11/7/95	Wearing apparel, namely jeans, jackets, T-shirts, sweaters, slacks, woven shirts, vests, ties, hats, sweatshirts, overalls and belts.
POLO SPORT	1,951,601	1/23/96	Wearing apparel, namely pants, shorts, jackets, T-shirts, sport shirts, knit shirts, sweatshirts, hats, socks and footwear.
RALPH LAUREN	1,976,324	5/28/96	Clutches, shoulder bags, cosmetic bags, tote bags, saddle bags, backpacks, gym bags, duffle bags, travel bags, circular cosmetic and personal grooming bags, clothing and personal item bags with drawstrings for over the shoulder use, grooming kits in the nature of small traveling bags for carrying personal hygiene items, traveling bags designed for holding suits, tie cases, satchels, purses and other personal item bags with rigid top supports, garment bags for travel, traveling bags for carrying personal items and clothing, coin bags, drawstring pouches, overnight bags, wallets and key holders, all sold empty.





<u>Trademark</u>	<u>Registration No.</u>	<u>Registration Date</u>	<u>Goods</u>
POLO JEANS CO.	2,049,948	4/1/97	Wearing apparel, namely, jeans, T-shirts, knit shirts, sweatshirts, overalls, blouses, skirts, dresses and hats.
DESIGN ONLY polo player astride horse	2,052,315	4/15/97	Clutches, shoulder bags, cosmetic bags sold empty, tote bags, saddle bags, backpacks, gym bags, duffle bags, travel bags, roll bags, sling bags, grooming kits sold empty, suit bags, tie cases, satchels, pole bags, garment bags for travel, coin purses, drawstring pouches, overnight bags, wallets and key cases.
POLO RALPH LAUREN and Design	2,077,082	7/8/97	Clutches, shoulder bags, cosmetic bags sold empty, tote bags, saddle bags, backpacks, gym bags, duffle bags, travel bags, roll bags, sling bags, grooming kits sold empty, suit bags, tie cases, satchels, garment bags for travel, coin purses, drawstring pouches, overnight bags, wallets and key cases.
RALPH	2,175,394	7/21/98	Frames for prescription and non-prescription lenses, and complete sunglasses.
CHAPS	2,137,833	2/17/98	Frames for prescription and non-prescription lenses, and complete sunglasses.
LAUREN	2,246,900	5/25/99	Wearing apparel, namely, topcoats, raincoats, jackets, suit jackets, suit coats, sport coats, sport jackets, blazers, blouses, shirts, shirt jackets, pants, skirts, dresses, sweaters, tee shirts, hats and scarves.
RLX	2,276,536	9/7/99	Wearing apparel, namely, pants, shorts, jackets, coats, woven shirts, T-shirts, knit shirts, sweaters, sweatshirts, blouses, skirts, dresses, hats, footwear, socks, hosiery and gloves.
RL	2,312,818	2/1/00	Wearing apparel, namely, jeans, jackets, woven shirts, T-shirts, knit shirts, sweatshirts, overalls, pants, sweaters, shorts, vests, ties, bathing suits, scarves, hosiery, bodysuits, belts, blouses, skirts, dresses, coats, hats and shoes.
LAUREN	2,419,959	1/9/01	Handbags, clutches, shoulder bags, tote bags, backpacks, duffle bags, travel bags, suit bags, satchels, garment bags for travel, coin purses, drawstring pouches, overnight bags, wallets and key cases.
CHAPS	2,505,790	11/13/01	Clothing, namely, sport shirts, sweaters, sweatshirts, t-shirts, shorts, jackets, pants, sport jackets and suits.
RALPH	2,527,823	1/8/02	Clutches, shoulder bags, cosmetic bags sold empty, tote bags, saddle bags, backpacks, gym bags, duffle bags, travel bags, roll bags, sling bags, grooming kits sold empty, suit bags, tie cases, satchels, garment bags for travel, coin purses, drawstring pouches, overnight bags, wallets and key cases.
POLO GOLF	2,686,291	2/11/03	Wearing apparel, namely, shirts, sweaters, pants, sweatshirts and t-shirt.
PINK PONY	3,036,422	12/27/05	Tote Bags, Clothing – namely, sweaters and t-shirts.
RL	3,120,485	7/25/06	Eyeglasses, sunglasses, cases for eyeglasses and sunglasses.



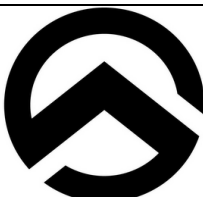

<u>Trademark</u>	<u>Registration No.</u>	<u>Registration Date</u>	<u>Goods</u>
Polo Player Design	3,199,839	1/16/07	Wearing apparel, namely, jackets, sweatshirts, sweat pants, hats, scarves, jerseys, jeans, turtlenecks and bikinis
RALPH LAUREN GOLF	3,213,555	2/27/07	Sports and leisure wear, namely, shorts, pants, golf trousers, t-shirts, polo shirts, rugby shirts, golf shirts, tank tops, jerseys, tights, stockings, leotards, unitards, body suits, leg warmers, leggings, socks, gloves, athletic uniforms, jackets, parkas, ponchos, swimwear, sweaters, fleece pullovers, sweat suits, jogging suits, rain suits, boots, slippers, sandals, athletic footwear, hats, caps, visors, head bands, wrist bands, tennis wear, golf wear, namely, shoes and shirts; ski wear; wearing apparel namely, slacks, jeans, belts, suspenders, shirts, twin sets, ties, men's and women's suits, vests, undergarments, sweaters, blazers, coats, scarves, shawls, robes, sleepwear, loungewear and all purpose footwear excluding orthopedic footwear.
RALPH LAUREN TENNIS	3,215,910	3/6/07	Sports and leisure wear, namely, shorts, pants, golf trousers, t-shirts, polo shirts, rugby shirts, golf shirts, tank tops, jerseys, tights, stockings, leotards, unitards, body suits, leg warmers, leggings, socks, gloves, athletic uniforms, jackets, parkas, ponchos, swimwear, sweaters, fleece pullovers, sweat suits, jogging suits, rain suits, boots, slippers, sandals, athletic footwear, hats, caps, visors, head bands, wrist bands, tennis wear, golf wear, namely, shoes and shirts; ski wear; wearing apparel namely, slacks, jeans, belts, suspenders, shirts, twin sets, ties, men's and women's suits, vests, undergarments, sweaters, blazers, coats, scarves, shawls, robes, sleepwear, loungewear and all purpose footwear excluding orthopedic footwear.
RALPH LAUREN SPORT	3,218,130	3/13/07	Sports and leisure wear, namely, shorts, pants, golf trousers, t-shirts, polo shirts, rugby shirts, golf shirts, tank tops, jerseys, tights, stockings, leotards, unitards, body suits, leg warmers, leggings, socks, gloves, athletic uniforms, jackets, parkas, ponchos, swimwear, sweaters, fleece pullovers, sweat suits, jogging suits, rain suits, boots, slippers, sandals, athletic footwear, hats, caps, visors, head bands, wrist bands, tennis wear, golf wear, namely, shoes and shirts; ski wear; wearing apparel namely, slacks, jeans, belts, suspenders, shirts, twin sets, ties, men's and women's suits, vests, undergarments, sweaters, blazers, coats, scarves, shawls, robes, sleepwear, loungewear and all purpose footwear excluding orthopedic footwear.
C (Stylized)	3,225,869	4/3/07	Wearing apparel, namely, sport shirts, knit shirts, sweaters, sweatshirts, t-shirts, blouses, shorts, jackets, pants, jeans, overalls, skirts, dresses, hats, socks and swimwear.
CHAPS	2,137,833	2/17/98	Frames for prescription and non-prescription lenses and complete sunglasses







<u>Trademark</u>	<u>Registration No.</u>	<u>Registration Date</u>	<u>Goods</u>
PINK PONY	3,245,586	5/22/07	Wearing apparel, namely, jackets, sweatshirts, sweat pants, hats, scarves, jerseys, jeans, turtlenecks and bikinis.
LAUREN JEANS COMPANY	3,254,299	6/19/07	Wearing apparel, namely, jeans, vests, jackets, coats, shirts, sweatshirts, overalls, blouses, skirts, dresses, hats, pants, socks, gloves and footwear.
RL	3,687,528	9/22/09	Handbags, clutches, shoulder bags, tote bags, backpacks, saddle bags, duffle bags, travel bags, suit bags, satchels, hip packs, roll bags, carryalls, garment bags, suit cases, coin purses, drawstring pouches, briefcases, attaché cases, wallets, key cases, billfolds, tie cases, credit card cases, business card cases, grooming kits sold empty, cosmetics and toilet bags sold empty, shaving bags sold empty, and umbrellas.
DESIGN ONLY	4,169,636	7/10/12	Handbag.
POLO	1,532,557	4/4/89	Lotions for use after shaving
RALPH	2,562,975	4/23/02	Eau de toilette, skin and body lotions
LAUREN	1,489,796	5/31/88	Toilet water
RALPH LAUREN	1,222,278	1/4/83	Cologne, aftershave, aftershave balm, antiperspirant, personal deodorant, toilet water, body lotion, bath oil, body powder, perfume
Horse & Polo Rider Design	1,212,060	10/12/82	Cologne, aftershave, aftershave balm, antiperspirant, toilet water
RL	2,891,892	10/5/04	Fragrances, namely, eau de toilette, namely, after-shave splash, after-shave balm
RALPH LAUREN ROMANCE	2,318,372	2/15/00	Eau de parfum
POLO RED	4,506,000	4/1/14	Eau de toilette, after shave preparations, body spray, and personal deodorant
POLO BLUE	2,782,617	11/11/03	Eau de toilette, after shave gel, shower gel, and personal deodorant
POLO SPORT	1,858,094	10/11/94	Toilette water, deodorants
POLO BLACK	3,130,913	8/15/06	Eau de toilette, after shave splash, after shave gel, shower gel, personal deodorant
LAUREN RALPH LAUREN (Stylized)	1,160,547	7/14/81	Cologne, toilet water, body lotion, and perfume
CHAPS	3,358,110	12/18/07	Eau de toilette

THE NORTH FACE APPAREL CORP.


<u>TRADEMARK</u>	<u>TM LOGO</u>	<u>REGISTRATION NO.</u>	<u>GOODS</u>
5 DIMENSIONAL FIT		3994568	gloves
BETTER THAN NAKED		4384202	apparel, namely tops and bottoms
ETIP		4456114	gloves
EXPLORE FUND		4071167	grant making services, namely, providing funding to organizations working to increase participation in outdoor activities
EZ GROW		3931440	Clothing for children, namely, coats, jackets, wind-resistant jackets, ski jackets, rain jackets; pants, bib pants, snow pants, snowboard wear, and shells
FLASH DRY		3857227	foundation garments; pants; short-sleeved or long-sleeved t-shirts; sweat pants; t-shirts; under garments; sports shirts; polo shirts; pullovers; dress shirts
FLASHDRY		4724069	baselayer bottoms; baselayer tops; bottoms; coats; foundation garments; gloves; jackets; pants; parkas; tops
FLASHDRY DESIGN		4716717	tops

<u>TRADEMARK</u>	<u>TM LOGO</u>	<u>REGISTRATION NO.</u>	<u>GOODS</u>
FLIGHT SERIES AND DESIGN		3535308	Clothing, namely, non-aviation jackets, vests, shells, rainwear, wind resistant jackets, shorts, shirts, t-shirts
HEAL CRADLE		3599066	footwear, namely, insoles as an integrated feature of footwear
HEATSEEKER		4115274	insulated fabric sold as an integral component of footwear, namely, athletic shoes and boots
HEATSEEKER & Design		3815313	insulated fabric sold as an intergral component of finished footwear, namely, boots
HYDROSEAL		3630550	Footwear
HYDROTRAK		3455200	footwear, namely, trekking shoes, hiking shoes, climbing shoes
HYVENT		3103077	shoes, athletic shoes; jackets; outerwear, namely, bib pants and shells; one-piece shell suits, mittens, rain gear, parkas, side zip pants, shells, gloves, wind jackets, and shoes, vests, pants
ICEPICK		3835454	footwear
MISCELLANEOUS DESIGN (N DESIGN)		1102407	retail store, mail order, and distributorship services in the field of camping and outdoor gear and sport equipment
MISCELLANEOUS DESIGN (N DESIGN)		1030071	backpacks, sleeping bags, tents, camping clothing, namely, rainwear, parkas, vests, trousers, shoes, gloves, headgear and snowshoes

<u>TRADEMARK</u>	<u>TM LOGO</u>	<u>REGISTRATION NO.</u>	<u>GOODS</u>
MISCELLANEOUS DESIGN (N DESIGN)		3630850	Footwear; Gloves; Headgear, namely, hats, caps, headbands, visors; Hosiery, namely, long underwear; Jackets; Mittens; Pants; Parkas; Shirts; Shorts; Ski jackets; Skirts; Tights; Vests
MISCELLANEOUS DESIGN (S DESIGN)		3418103	footwear
MISCELLANEOUS DESIGN (S DESIGN)		3373851	backpacks, internal frame packs, sleeping bags, tents and tent accessories, namely, rain flies, clothing, footwear, namely, t-shirts, shirts, tops, pants, side zip pants, parkas, coats, jackets, wind-resistant jackets, pullovers, sweaters, overalls, thermal underwear, gloves, mittens, shells, one-piece shell suits, ski wear, ski suits, ski jackets, ski bibs, bib overalls, bib pants, snowboard wear, snow pants, snow suits, rainwear, rain jackets, rain pants
NEVER STOP EXPLORING		3630564	retail store and on-line retail store services in the field of apparel, camping and outdoor gear, and outdoor sporting goods equipment
NORTHOTIC		3450790	footwear, namely, trekking boots, hiking boots
NUPTSE		3442183	clothing, namely, jackets, vests, and footwear
OPTIFIT		4455942	bags and backpacks
PARK + PIPE OPEN SERIES		4095500	entertainment in the nature of competitions in the field of skiing; organizing sporting events, namely, athletic competitions in the field of skiing
SNAKE PLATE		3554653	footwear

<u>TRADEMARK</u>	<u>TM LOGO</u>	<u>REGISTRATION NO.</u>	<u>GOODS</u>
SUMMIT SERIES AND DESIGN		3349240	backpacks, internal frame packs, sleeping bags, tents and tent accessories, namely, rain flies, clothing, namely, jackets, parkas, coats, pants, bib overall pants, one-piece shell suits, shells, mittens, gloves, rainwear, wind resistant jackets, shirts, t-shirts, thermal underwear,; boots, namely, shoes, namely, climbing
SUMMIT SERIES AND DESIGN		3479423	footwear
THE NORTH FACE		3541797	metal tent stakes
THE NORTH FACE		3294604	retail store, mail order, and distributorship services in the fields of camping and outdoor gear, hardware and sports equipment
THE NORTH FACE		983624	Backpacks, sleeping bags, tents, camping clothing namely rainwear, parkas, vests, trousers, shoes, gloves and headgear , snowshoes and skis
THE NORTH FACE AND DESIGN		2300758	shoes
THE NORTH FACE AND DESIGN		3294605	retail store, mail order, and distributorship services in the fields of camping and outdoor gear, hardware and sports equipment
THE NORTH FACE AND DESIGN		2097715	backpacks, sleeping bags, tents, clothing, namely, parkas, vests, jackets, anoraks, pants, ski bibs, gloves, mittens, underwear, hats, headbands, caps, ski suits, gaiters, shorts, and shirts
THE NORTH FACE AND DESIGN		3630846	footwear; head wear; rainwear; scarves; ski wear

<u>TRADEMARK</u>	<u>TM LOGO</u>	<u>REGISTRATION NO.</u>	<u>GOODS</u>
THE NORTH FACE AND DESIGN (HORIZONTAL)		3630565	footwear
THE NORTH FACE AND DESIGN IN RED SQUARE (CLAIMING COLOR RED)		3538773	computer bags, all purpose sporting bags, backpacks, day packs, knapsacks, rucksacks, book bags, tote bags, handbags, duffel bags, knap sacks and duffel sacks, hip and lumbar packs, shoulder bags, book bags, waist packs, fanny packs, day packs, shoulder bags, satchels, mountaineering bags, boston bags, internal frame packs, backpack bottle pockets, rain covers used to cover the aforesaid; hydration packs, namely, backpack hydration systems consisting of a backpack, a reservoir, and a mouthpiece connected to the reservoir by a tube; parts and fittings for all the aforesaid goods, sleeping bags; covers for sleeping bags; sacks for carrying and storing sleeping bags; non-metal tent poles and tent stakes, hydration packs, namely, hydration system consisting of a reservoir and a mouthpiece connected to the reservoir by a tube, tents; tent accessories, namely, tent storage bags, rain flies, vinyl ground cloths, tent pole storage sacks, clothing, namely, men's, women's, and children's t-shirts, shirts, tops, sweatshirts, sweatpants, pants, side zip pants, shorts, trousers, vests, parkas, anoraks, coats, jackets, wind-resistant jackets, jacket hoods, pullovers, sweaters, underwear, thermal underwear, tights, gloves, mittens; outerwear, namely, shells, one-piece shell suits, ski wear, ski suits, ski vests, ski jackets, ski bibs, bib overalls, bib pants, snowboard wear, snow pants, snow suits, rain wear, rain jackets, rain pants, gaiters, namely, neck gaiters, skirts, skorts, dresses, swim trunks;

<u>TRADEMARK</u>	<u>TM LOGO</u>	<u>REGISTRATION NO.</u>	<u>GOODS</u>
			footwear, namely, athletic shoes, sneakers, trail running shoes, climbing shoes, hiking shoes, slippers, boots, trekking boots, hiking boots, snowshoes, sandals; headgear, namely, caps, hats, headbands, scarves, earbands, balaclavas, visors, beanies; on-line retail store services, retail store services, mail order, catalogue and distributorship services, all featuring camping and outdoor gear and equipment, hardware, clothing, sportswear, eyewear, footwear, headgear, sports equipment and related accessories
THE NORTH FACE ENDURANCE CHALLENGE		3595442	organizing exhibitions and sporting events in the fields of running
THE NORTH FACE NEVER STOP EXPLORING SPEAKER SERIES		3454860	arranging seminars and lectures in the fields of adventure and endurance sports, namely, skiing, snowboarding, running, climbing, and hiking; conducting seminars and lectures in the fields of adventure and endurance sports, namely, skiing, snowboarding, running, climbing, and hiking
THERMOBALL and Design		4716718	anoraks; baselayer bottoms; baselayer tops; bottoms; coats; footwear; gloves; headwear; jackets; outdoor gloves; pants; ski gloves; ski pants; snow pants; snowboard gloves; snowboard pants; tops
TNF WINTER GRIP		3044570	footwear
TRICLIMATE		3455206	clothing, namely jackets, parkas, pants, shirts, vests, shells, bib pants and one-piece shell suits
ULTRATAC		3558969	footwear
WINDWALL		2907291	jackets, wind resistant jackets and vests
WINDWALL		3923048	gloves

TIMBERLAND, A DIVISION OF VF OUTDOOR, LLC AND TBL LICENSING LLC

<u>TRADEMARK</u>	<u>REG. NO.</u>	<u>REG. DATE</u>	<u>GOODS & SERVICES</u>
TIMBERLAND	2,932,268	3/15/05	Footwear; clothing, namely coats, jackets, rainwear, sweaters, shirts, pants, shorts, headwear, gloves, neckwear, belts, sweatshirts, t-shirts, vests, socks.
TREE DESIGN	2,947,228	5/1/05	Footwear; clothing, namely coats, jackets, rainwear, sweaters, shirts, pants, shorts, headwear, gloves, neckwear, belts, sweatshirts, t-shirts, vests, socks.
TIMBERLAND (word mark)	1,592,927	4/24/90	Watches.
TIMBERLAND (word mark)	1,600,223	6/12/90	Shoe care products, namely water repellant.
Timberland Tree circle design	1,610,987	8/28/90	Shoe care products, namely water repellant.
Timberland Tree circle design	1,607,424	7/24/90	Watches.
TIMBERLAND (word mark)	1,523,598	2/7/89	Clothing, namely coats, jackets, rainwear, sweaters, shirts, pants, caps, hats, gloves, scarf's, belts, t-shirts and vests.
Timberland Tree circle design	1,552,963	8/22/89	Clothing, namely coats, jackets, rainwear, sweaters, shirts, pants, caps, hats, gloves, scarf's, belts, t-shirts and vests.
TIMBERLAND (word mark)	1,588,288	3/20/90	Store services in clothing, footwear, outerwear, leather or leather and fabric accessories, such as, but not limited to, portfolios, handbags, belts, keychains, calendar books, wallets, tie cases, and the like, shoe care products and watches.
TIMBERLAND (word mark)	1,849,012	8/9/94	Sunglasses.
Tree design	1,843,478	7/5/94	Sunglasses.
TBL	2,112,526	11/11/97	Clothing, namely, jackets, hats, shirts and sweatshirts.
Timberland Tree circle design	1,502,205	8/30/88	Leather goods, namely, key fobs, luggage, tags, credit card cases, wallets, portfolio type briefcases, duffel bags, backpacks and briefcases.
TIMBERLAND (word mark)	1,502,204	8/30/88	Leather goods, namely, key fobs, luggage tags, credit card cases, wallets, portfolio type briefcases, duffel bags, backpacks and briefcases.
TIMBERLAND word with tree circle design	1,355,531	8/20/85	Clothing, namely footwear, shirts, jackets, coats, sweatshirts, T-shirts, jerseys, sweaters, vests, belts and hats.
TIMBERLAND (word mark)	1,300,704	10/16/84	Footwear, namely, men's women's and children's boots, work shoes, hiking shoes, boat shoes and other footwear.
Timberland Tree circle design	1,075,061	10/11/77	Footwear, namely, men's, women's and children's boots, work shoes and hiking shoes.